



Mike Carroll
Secretary

DEPARTMENT OF CHILDREN AND FAMILIES OFFICE OF INSPECTOR GENERAL

**Management Review
Case Number: 2018-0014**



Keith R. Parks
Inspector General

INTRODUCTION

On February 15, 2018, in response to information obtained regarding a potential systemic problem with foster care placement tracking issues by Community-Based Care Lead Agency Eckerd Connects-Hillsborough (Eckerd) and subcontracted provider Youth and Family Alternatives, Inc. (YFA)¹ in Circuit 13, Department of Children and Families (Department) Secretary Mike Carroll requested that the Office of Inspector General (OIG) conduct a management review of two specific data issues, as follows:

1. What was the process for reporting youth sleeping in locations other than approved placements in Circuit 13 and was the information accurately reported to the Department as required after November 14, 2017?
2. Did Florida Safe Families Network (FSFN) placement information accurately represent placements of children under the supervision of Eckerd?

BACKGROUND

On November 14, 2017, SunCoast Regional Program Manager Kathleen Cowan sent an e-mail to Eckerd Chief of Performance and Quality Lorita Shirley² and Eckerd Associate Executive Director Genet Stewart³ requesting that Eckerd resume using a Placement Assignment Log (the Spreadsheet) to report placement issues for youth who, in the previous seven days:

- Had three or more placements;
- Slept in a non-licensed bed (i.e., office, vehicle, lobby, etc.);
- Were placed with a relative or non-relative without an approved homestudy;
- Were placed in a home for the purpose of sleeping only; or
- Had refused a placement.

Ms. Cowan's e-mail indicated that the Spreadsheet should be updated each Monday for the week prior and used through January 29, 2018, at which time it would be re-evaluated for need. That same date, Ms. Shirley responded to Ms. Cowan via e-mail indicating that the process would "absolutely" be resumed.

The Spreadsheet contained the name, age, and date of birth of the child(ren) with placement issues (as noted above), incident date, Case Management Organization

¹ On February 6, 2018, notice was provided that Contract #ECA-C13-CMO-YFA-FY20 between Eckerd and YFA would be terminated effective May 8, 2018.

² At the time, Ms. Shirley was Eckerd Chief of Community Based Care. Effective May 14, 2018, Ms. Shirley became Eckerd Chief of Performance and Quality.

³ Copied on the e-mail were Interim SunCoast Regional Managing Director Jennifer Kuhn, Circuit 20 Family Safety and Community Services Director Kimberly Williams, Circuit 13 Contracts Manager Dacia Drury, and Circuit 20 Government Operations Consultant (GOC) II Deborah Wilson.

(CMO)⁴ providing the services to the child/children, and where the child would like to be placed. Eckerd was to collect the information from the CMOs and submit it on the Spreadsheet to Ms. Cowan.

On February 6, 2018, News Channel 8 aired an investigative report following a “month-long investigation” of foster care in Hillsborough County, reporting that hard-to-place foster teens “are forced to spend their days” in vehicles at a local convenience store rather than at school, therapy, or foster homes. On February 15, 2018, Secretary Carroll indicated that he would initiate a Department peer review team to gather information to identify the causes of systemic problems in the foster care system in Hillsborough County and also requested that the OIG examine the data issues noted in the Introduction Section of this report. On March 5, 2018, a Department peer review team of experts convened in Tampa at a public forum to hear from citizens on the issues.

ISSUES AND FINDINGS

Issue 1

What was the process for reporting youth sleeping in locations other than approved placements in Circuit 13 and was the information accurately reported to the Department as required after November 14, 2017?

Governing Directives

§ 39.0001(1)(a), F.S.; § 409.165(1)(a), (b), and (c), F.S.; § 409.986(1)(a), F.S.; Rule 60L-36.005, F.A.C.; Rule 65C-30.0001(80) and (88), F.A.C.; Attachment I, B.1.a.2), Contract #QJ3E0 between the Department and Eckerd Connects-Hillsborough (Eckerd); and Article 1:2. and Article 2:3.(b), Contract #ECA-C13-CMO-YFA-FY17 and #ECA-C13-CMO-YFA-FY20 between ECA and Youth and Family Alternatives, Inc. (YFA).

Findings

The following individuals were interviewed:

- SunCoast Regional Program Manager Kathleen Cowan
- Eckerd Chief of Performance and Quality Lorita Shirley
- Eckerd Out-of-Home Care Director DeAndrea Thomas⁵
- YFA Assistant Program Director Nyla Williams
- YFA Quality Control Coordinator Laurel Drew
- YFA CM Ilesha Rodriguez
- Eckerd Senior Placement Coordinator Alicia Kirkhom
- Eckerd Director of Quality Control Kathy Bartlett
- Eckerd Quality Management Specialist Tanya Brown

⁴ At the time, Eckerd subcontracted with three CMOs: YFA, Devereux Community Based Care, Inc. (Devereux), and Gulf Coast Jewish Family and Community Services (GCJFCS).

⁵ Ms. Thomas supervises the Eckerd Placement Team, which is comprised of eight placement coordinators.

DESCRIPTION OF REPORTING PROCESS

On November 14, 2017, the Department requested that Eckerd report, via the Spreadsheet on a weekly basis (the preceding seven days), all problem placements for children in their care via e-mail every Monday to Ms. Cowan. As of the first week of February 2018, the Spreadsheet began being submitted daily.

The Spreadsheet requests specific information via the following questions, quoted in pertinent part:

- *In the past 7 days, did the youth have 3 or More Placements?*
- *In the past 7 days, did the youth sleep in a non-licensed bed (i.e. Office, Car, Lobby, etc.)?*
- *In the past 7 days, was the youth placed with a relative or non-relative without an a [sic] Approved Homestudy?*
- *In the past 7 day [sic], was the youth placed in a home for the Purpose of Sleeping Only?*
- *If youth did not sleep in approved placement, where did he/she sleep?*
- *Did youth “run” from the office or another setting while awaiting placement?*
- *Did the Youth Refuse Placement During Past 7 Days*
- *If Yes, Where did Youth Refuse Placement?*
- *If Yes, Why did Youth Refuse Placement?*

The Spreadsheet is completed by Ms. Thomas, who receives the information concerning problem placements by e-mail, telephone, or text message from the Eckerd Placement Team, who receives the information via e-mail, telephone, or text message from the case managers (CMs) when the CMs identify a problem placement. In addition to e-mailing the Spreadsheet to Ms. Cowan, Ms. Thomas notifies Ms. Shirley by telephone or text message.

If there is an inappropriate placement, CMs also complete an Incident Report describing the inappropriate placement as a critical incident. Critical incidents are reported to the Department via an Incident Reporting and Analysis System (IRAS) submission.

WITNESS TESTIMONY

Per Ms. Cowan, the Spreadsheet was reinitiated⁶ to track child placements⁷ because of child placement instability in Circuit 13. For the purposes of the Spreadsheet, child placement instability only addressed overnight placements. For example, a child that refused to attend school and was left in the care of a CM or family support worker (FSW) for an extended period of time during the day is not reflected on the Spreadsheet. The majority of placement issues were night-to-night placements, in which a child spent each night in a different foster care facility. Ms. Thomas (or a placement supervisor, if Ms. Thomas is unavailable) compiles the information

⁶ Ms. Cowan explained that this was the second time the Spreadsheet was initiated. Approximately two years prior (2015), the Spreadsheet was initiated due to media coverage of children sleeping in offices in Hillsborough County.

⁷ Ms. Cowan indicated that, in her opinion, placement referred to a child spending the night at a specific location (approved or unapproved).

documented on the Spreadsheet and sends it to Ms. Cowan every Monday for the previous week. Eckerd is responsible for entering the placement data into FSFN.

In addition to her weekly Spreadsheet review, Ms. Cowan reviews the IRAS reports daily. Eckerd or the CMOs submit Incident Reports to IRAS electronically to document critical incidents, including inappropriate placements.⁸ After reviewing IRAS, Ms. Cowan views placement information in the FSFN placement tab and compares it with the FSFN case notes, legal information, and missing child information (if greater than 24 hours) to account for the child's location at all times and determine if the placement information is accurate. If discrepancies are noted, Ms. Cowan contacts Ms. Shirley, Ms. Thomas, or Ms. Bartlett in an attempt to clarify and correct the discrepancies.

Ms. Shirley said she is not directly involved in the placement process, but understood that the Spreadsheet is used to track the placements of children that refused placements, spent time in licensed foster facilities on a night-to-night basis, and/or faced other placement challenges. Initially, one of the issues Eckerd experienced with the Spreadsheet was that there were no written guidelines explaining exactly what needed to be entered on it. Ms. Shirley instructed Ms. Thomas to modify the Spreadsheet to include the name of every child with a placement issue.

On July 31, 2017, Ms. Shirley initiated a written Refusal Protocol, which Eckerd provided to YFA, Devereux, and GCJFCS. The Refusal Protocol outlined the steps a CM should follow when a child refuses placement.

Children refusing placements in Hillsborough County had been an ongoing problem for several months. In August 2017, she (Ms. Shirley) requested that Secretary Carroll meet with Eckerd shareholders and subcontracted providers (YFA, Devereux, and GCJFCS) to discuss how the problem of children refusing placement was going to be addressed. From that meeting came two recommendations: implement a multidisciplinary staffing process, wherein the behavioral issues of the child would be addressed; and determine the ramifications for foster care providers that declined to take in a child for a period of time resulting in the child being placed in a different licensed foster care facility on a night-to-night basis.

According to Ms. Shirley, when a child is removed from their home as a result of a child protective investigation, the child must be placed with a relative or in foster care within four hours.⁹ If a placement is not secured within the four-hour timeframe, Eckerd assumes responsibility for the coordination of supervision of the child until a placement is secured.¹⁰ This differs for children provided services by a CMO, for whom there is no specific timeframe to find a placement.¹¹ If a child refuses placement and Eckerd is attempting to locate another placement, the CM must notify a member of the Eckerd

⁸ CFOP 215-6 [Incident Reporting and Analysis System (IRAS)] reporting requirements do not list inappropriate placement as a critical incident. Eckerd added "inappropriate placement" as a critical incident to their Incident Report so that inappropriate placements would be documented in IRAS; however, it is classified as "Other" and not reported to the Department.

⁹ The four-hour requirement is set forth in a July 1, 2012 Interagency Working Agreement between the Hillsborough County Sheriff's Office (HCSO) Child Protective Investigations Division and Eckerd.

¹⁰ On May 16, 2018, in a verbal response to the OIG, Ms. Shirley clarified that as the lead agency, Eckerd does not directly supervise any children.

¹¹ In her verbal response, Ms. Shirley emphasized that the formality, but not the importance, of the required timeframe goes away.

Placement Team via telephone or text message. A member of the Eckerd Placement Team then notifies Ms. Thomas, who will verbally notify her (Ms. Shirley).

A child refusing a placement resulting in the child spending the night in a CM's vehicle is not "called" an inappropriate placement; it is "called" a refusal.¹² Based on a Department memorandum dated June 22, 2016, Eckerd determined that a child staying in an office or a hotel is considered an inappropriate placement, classified as a critical incident on the Incident Report, and reported to the Department, but a child refusing placement and staying in a CM's vehicle is classified as a non-critical incident and not reported to the Department. Initially, it was her belief that both inappropriate placements and refusals of placement were reported to the Department; however, she was subsequently advised (unknown exact date) by Ms. Bartlett that only inappropriate placements should be reported to the Department.

Ms. Shirley's Verbal Response

In her verbal response to the OIG, Ms. Shirley clarified the above testimony by indicating that a youth spending the night in any unapproved placement is still considered inappropriate. She explained that refusals were always reported to the Department (Ms. Cowan) verbally. Eckerd's mistake was in attempting to distinguish between refusals and instances where placements could not be located in the written reports, and by Ms. Bartlett creating a non-critical category on incident reports that was not added to IRAS and therefore not reported to the Department in writing. Ms. Shirley believed this to be an internal misunderstanding on the part of Eckerd.

Ms. Thomas was the Eckerd Interim Out-of-Home Care Director from September 2017 until February 2018, at which time she became the permanent Eckerd Out-of-Home Care Director. She is responsible for completing the Spreadsheet and she is the person who decided to begin e-mailing it daily to Ms. Cowan. Information regarding a child refusing placement or inappropriate placements is provided by the assigned CM. When a refusal or inappropriate placement issue arises, the CM contacts Out-of-Home Care staff,¹³ who notify Ms. Thomas by text message, e-mail, or telephone. She defines a placement as the location a child spends the night and does not know if Eckerd has any specific policy or directive that addresses or defines "placement." If a child is not in school or foster care, the child is the responsibility of the CM until a placement is found.

Ms. Williams has been an assistant program director for approximately two years. If there is a child placement issue, the program director or an assistant program director would be notified. If a child refused a placement, she or the program director would be notified immediately and the Refusal Protocol would be initiated. Eckerd Out-of-Home Care is notified in order to obtain a secondary placement option, if possible. When a child refuses a placement and spends the night somewhere other than the approved placement, the information is detailed in an Incident Report. If the child is not in the approved placement, FSN placement information should be updated in order to track the child's placement. If a foster home declines to take a child, CMs do not include the information in the FSN case notes or in the FSN placement tab,¹⁴ but may document

¹² In their written response, YFA clarified that they construe "a child spending the night in a CM's vehicle an inappropriate placement regardless of whether the child refused a placement..."

¹³ Out-of-Home Care staff provide coverage seven days a week, 24 hours per day.

¹⁴ Ms. Williams testified that the entry of placement information into FSN is the responsibility of Eckerd, not YFA.

it in a text message or via telephone to Eckerd Out-of-Home Care staff working at the time. These incidents normally occur later in the evening. YFA does not have any policies that address placements because placement is Eckerd's responsibility. After Eckerd finds a placement, the CM or FSW transports the child to that location.

Ms. Drew receives the Incident Report after it has been completed by the CM or CMS and approved by the program director. If the information in the Incident Report is deemed a critical incident, it is sent to Eckerd, who then submits the report to the Department via the Department Web Portal. The critical incident information is required to be reported to the Department within 24 hours after the incident is documented. If an inappropriate placement is downgraded to non-critical by Eckerd, the Department is not notified of the incident. Ms. Drew would be notified, typically via e-mail, by Ms. Bartlett or Eckerd Quality Management Specialist Tanya Brown if the incident was downgraded.

Ms. Rodriguez said that when a child refuses a placement, the Refusal Protocol is initiated. After completing the Refusal Protocol, there is no policy or procedure in place for documenting the refusal. If she is having a placement issue, she will notify her CMS, then wait with the child until a new placement is located. Depending on where she is at the time, she will either return with the child to the office or find a public place (i.e., McDonalds, Burger King, etc.) to wait until a placement is located. There are no guidelines or policies on how to document where they go or what they do while waiting. If a child refuses placement and it is late, she will bring the child to the office and stay with the child (there is an area in the back of the office where they can go), but she does not document it in FSN or anywhere else, and there are no procedures for documenting this situation. She notifies her supervisor or the child's CM if it is not one of her cases. She does not notify Eckerd directly that there was a problem placement. Eckerd is notified by the CMS, assistant program director, or program director. It is the responsibility of the primary CM, not the on-call CM, to complete Edit Reports, which are used to notify Eckerd of a change in placement. The on-call CM is responsible for notifying the child's CM of the placement and Eckerd will also e-mail the CM to notify them of the child's placement information.

Ms. Kirkhom supervises the placement coordinators, who facilitate the placement of children already in the foster care system. She explained that when a child refuses to go to the foster home selected, the foster parent is notified by a placement coordinator that the child refused. If the foster parent still agrees to take the child in, then that is where the child will be documented as placed. If the foster parent does not agree to take a child after the child refuses, then a new foster home is selected. Eckerd has a Refusal Protocol the CMOs are supposed to follow when a child refuses a placement. The CM or FSW will notify the placement coordinator, who will notify her that a child refused placement, and she then notifies Ms. Thomas. If a child refuses placement or a foster home cannot be located in a timely manner, the child is to go to supervision. If the child is refused supervision by G-Men Services,¹⁵ Ms. Kirkhom assumed that the CM is supposed to take the child to their office. When asked, she confirmed that they are not supposed to take the child to the library, Wawa, or McDonalds. When the Spreadsheet was reinstated in November 2017, Ms. Kirkhom was responsible for completing and submitting it to Ms. Cowan; however, now Ms. Thomas is responsible for doing so. Ms. Kirkhom believes the Incident Report should be completed by the

¹⁵ G-Men Services is a private company utilized by YFA to provide Supervision and Mentoring Services, and provides workers to supervise a child until placement is found.

CMO, but does not know who at Eckerd receives them because she is not involved in that process and only receives a copy if it involves a group home. She does not complete the Incident Reports and does not know whose responsibility it is to do so.

Ms. Bartlett reviews all Incident Reports pertaining to inappropriate placements before she enters them into the Department Web Portal. There is a difference between an inappropriate placement of a child and a child refusing a placement. A child in an inappropriate placement is a critical incident, reported to the Department; however, a child refusing a placement is not a critical incident and not reported to the Department. Ms. Shirley would also review the circumstances pertaining to an inappropriate placement versus a refusal to determine whether it was a critical incident that should be reported to the Department. Ms. Bartlett reviewed three incidents reported by YFA as inappropriate placements that were all downgraded because the child refused placement (October 26, 2017, December 8, 2017, and February 19, 2018).¹⁶ Eckerd does not have any guidelines or policies that define an inappropriate placement or what constitutes a refusal and, as a result, YFA and Eckerd's definition of an inappropriate placement differ. Eckerd has a Refusal Protocol that addresses the steps a CM or FSW must follow when a child refuses a placement. Ms. Bartlett indicated that inappropriate placement was added to the Eckerd Incident Report in December 2016.

Ms. Brown explained that her job is to review Incident Reports submitted to Eckerd by CMOs. The Incident Reports document the type of incident, date, time, who and when were notified, who completed the report, and a code that comes from the Department. She confirmed that if a child spent the night in an unapproved placement, it would be reported to Eckerd Quality Management.

After receiving the report of an inappropriate placement, she immediately notifies Ms. Bartlett, but Ms. Bartlett should already have been informed by the CMO. Both Ms. Brown and Ms. Bartlett review the incident to determine whether they have any additional questions. If Ms. Bartlett is not aware of the incident, she follows up on the report. The incident is "vetted" by Ms. Bartlett and senior management.¹⁷

Ms. Brown explained that inappropriate placements are considered critical incidents and should go into IRAS. If an Incident Report is deemed to be an inappropriate placement, she is notified and is responsible for notifying the Department and completing the IRAS report with data from the Incident Report. If an inappropriate placement is deemed not to be an inappropriate placement, the coding on the Incident Report is downgraded (deemed non-critical) and it would not be entered in IRAS.

Ms. Brown reviewed with the OIG Investigator an example Incident Report that had been downgraded, in which a child had refused placement and stayed with the CM in a vehicle from 11:59 p.m. until 6:30 a.m. This incident was downgraded because it was deemed not to be an overnight placement, as midnight started a new day, so the placement was not overnight. Ms. Brown stated, "Just because it is dark out does not mean that it is an overnight." She indicated that she was not saying a child staying in a vehicle was appropriate, but it was the beginning of a new calendar day so this incident was not deemed an inappropriate placement.¹⁸

¹⁶ Ms. Bartlett did not identify the case numbers or child names.

¹⁷ Ms. Brown identified senior management as Ms. Shirley and Eckerd Assistant Executive Director Genet Stewart.

¹⁸ In Ms. Shirley's testimony and verbal response, and in Eckerd's written response, they disagreed and indicated that this would have been considered an inappropriate placement.

An example of her interpretation of an inappropriate placement would be if a child did not have a place to sleep at 9:00 p.m., and at 3:00 a.m. the next day, the child had to stay in an office or somewhere else because the child did not have a placement prior to midnight.

Ms. Brown said the Eckerd Quality Management team has policies or guidelines for reviewing Incident Reports, but she was unsure whether the policies or guidelines were updated in September 2016 when the Incident Report form was updated.

CHILDREN NOT IN SCHOOL

Ms. Shirley explained that YFA was required to document children not in school in a weekly report, which was sent to Eckerd via e-mail, but not all children that were not attending school were listed in the weekly report. She did not have any documentation other than the weekly reports provided by YFA; however, on January 24, 2018, she was told by a child [REDACTED] (Child 1), who had been left unsupervised during the day by a YFA CM (not named), that other children were also being left unsupervised by CMs. Ms. Shirley indicated that none of these children were documented as not attending school on the weekly report. She added that the August 2017 spreadsheet was a profile of the problematic children that covered several issues and did not excuse YFA from identifying children not in school on the weekly reports going forward.

Ms. Shirley's Verbal Response

In follow-up to her verbal response, Ms. Shirley provided the OIG with an e-mail she received from Ms. Keller on January 30, 2018, in which Ms. Keller reported to her that [REDACTED] (Child 2) "is on the run." Ms. Shirley indicated that Child 2 was not reported "on the YFA weekly reports submitted...that were intended to clearly articulate which youth were attending or not attending school..."

YFA Chief Operating Officer (COO) John Luff related that YFA sent a weekly report via e-mail to Eckerd pertaining to children not in school, children refusing to go to school, and children missing school. Children over the age of 16 that were not in school or refused to go to school were not included on the weekly report. Eckerd was provided a spreadsheet in August 2017 with the names of the seven "problematic" children that were not enrolled in school or refused to attend school and were 16 years of age or older. The children listed in the spreadsheet were not listed in the weekly report because Eckerd was already aware of these children. These same problematic issues had been discussed during a meeting (August 16, 2017) with Eckerd and Secretary Carroll.

The children and their school situations were reported to Eckerd on the August 2017 spreadsheet as follows:

- [REDACTED] – "Not attending school. States he will get his GED after he turns 18."
- [REDACTED] (Child 3) – "She...has now been enrolled in PACE School for girls."

- Child 1 – “[Child 1] is not currently in school. Part of her current VOP...is for refusing to attend school. She can attend a GED program upon return or the Catapult program for credit recovery but those are her only options.”
- [REDACTED] – “The child is currently attending GED classes through Eckerd Academy...”
- [REDACTED] (Child 4) – “Refuses.”
- Child 2 – “The child is almost 16 years old and still in the 8th grade...The child plans to drop out and get her GED when she is 16...”
- [REDACTED] (Child 5) – “...The child is being enrolled in a school in the new placement.”

An OIG review of YFA e-mails provided by Mr. Luff and Ms. Gonyea revealed that Ms. Gonyea sent weekly¹⁹ e-mails to report placement issues, including children not enrolled in school, to Eckerd Senior Director Stephena Pierre, with copies to Ms. Shirley and Ms. Bartlett, as well as other individuals at Eckerd and YFA. The e-mails reviewed began on August 18, 2017 and covered the time period of August 11, 2017 through February 16, 2018. Beginning October 16, 2017, the weekly reports provided to Eckerd were modified to capture additional information surrounding children not enrolled in school.²⁰ The results of the OIG review are as follows:

Date Reported	Week of (as documented in the reporting e-mail)	Children Not Enrolled in School		
		Refused	Missed School >3 Days	Other Reasons
August 18, 2017	August 11 – 18, 2017	None	None	None
August 27, 2017	August 18 – 25, 2017	None	None	None
September 1, 2017	August 25, 2017 – September 1, 2017	None	None	None
September 16, 2017	September 1 – 8, 2017	None	None	None
September 16, 2017	September 8 – 15, 2017	None	None	None
September 23, 2017	September 16 – 22, 2017	None	None	None
October 2, 2017	September 22 – 29, 2017	None	Child 4 [REDACTED] (Child 6) [REDACTED] (Child 7) [REDACTED] (Child 8)	None
October 6, 2017	September 29, 2017 – October 6, 2017	None	Child 3 Child 4 Child 2 Child 6 Child 7 Child 8 [REDACTED] (Child 9) [REDACTED] (Child 10)	None

¹⁹ The OIG review determined that the e-mails were not always sent on a weekly basis.

²⁰ In her verbal response, Ms. Shirley indicated that the modifications were in response to a verified complaint by the Guardian ad Litem Program in Circuit 6 that a child had been in an office for the entire week because they were not enrolled in school.

Date Reported	Week of (as documented in the reporting e-mail)	Children Not Enrolled in School		
		Refused	Missed School >3 Days	Other Reasons
October 16, 2017	October 6 –13, 2017	None	Child 6 Child 7 Child 9 [REDACTED] (Child 11)	Child 3 Child 4 Child 2 Child 10 [REDACTED] (Child 12)
October 19, 2017	October 13 – 20, 2017	None	None	Child 3 Child 4 Child 2 Child 10 Child 12
October 29, 2017	October 20 – 27, 2017	[REDACTED]	Child 6	Child 3 Child 4 Child 2 Child 6 Child 10 Child 12
November 6, 2017	October 28, 2017 – November 3, 2017	None	Child 6	Child 3 Child 4 Child 6 Child 2 Child 10 Child 12
November 10, 2017	November 3 – 10, 2017	None	Child 6	Child 6
November 20, 2017	November 11 – 17, 2017	None	Child 6	Child 6
November 22, 2017	November 18 – 22, 2017	None	Child 6	Child 6
December 4, 2017	November 22, 2017 – December 1, 2017	Child 6	Child 6	Child 6
December 8, 2017	December 1 – 8, 2017	Child 6	Child 6	Child 6
December 15, 2017	December 8 – 15, 2017	None	None	None
December 27, 2017	December 15 – 22, 2017	None	None	None
January 5, 2018	December 29, 2017 – January 5, 2018	None	None	None
January 13, 2018	January 5 – 12, 2018	None	None	None
January 25, 2018	January 12 – 26, 2018	Child 5 ²² [REDACTED]	None	None
February 5, 2018	January 27, 2018 – February 2, 2018	None	None	None
February 12, 2018	February 2 – 9, 2018	Child 3 [REDACTED] (Child 13)	None	Child 2

²¹ There are two children with the same first name and surname, but different middle initial ([REDACTED]). As a result, it is unknown whether this is Child 7 or Child 13.

²² Child 5 was not reported in the January 25, 2018 e-mail; however, on February 6, 2018, Ms. Gonyea e-mailed a corrected report for the week of January 12 – 26, 2018, with Child 5 added.

²³ It is unknown whether this is Child 7 or Child 13.

Date Reported	Week of (as documented in the reporting e-mail)	Children Not Enrolled in School		
		Refused	Missed School >3 Days	Other Reasons
February 13, 2018	February 2 – 9, 2018 (adding information)	Child 3 Child 13	None	Child 2 [REDACTED] (Child 14)
February 19, 2018	February 9 – 16, 2018	Child 3 Child 4	None	Child 2 Child 14 [REDACTED]

OIG Note: Based on the testimony and records reviewed, there is no evidence to suggest that YFA failed to report all children not in school to Eckerd; however, it appears as though YFA may not have continuously reported all children not in school.

Of the seven children reported on the August 2017 spreadsheet, four (Child 3, Child 3, Child 4, and Child 5) were subsequently reported in one or more of YFA's weekly reports; however, Child 1 was not.

RECORDS REVIEWED

Department Memorandum Dated June 22, 2016

Ms. Cowan provided the OIG with a memorandum from Secretary Carroll to all Regional Managing Directors and Community Based Care Lead Agency CEOs, dated June 22, 2016. The memorandum included the following language, quoted in pertinent part:

This memo [sic] serves to reinforce the Department's expectation that no child removed from his/her home shall be allowed, directed, or otherwise put in a position to sleep or spend any significant, extended period of time in a...unapproved or unlicensed placement.

...When such an event occurs, the CBC Chief Executive Officer must immediately notify the Regional Managing Director (RMD) and shall include in the notification the child's names, location where the child will be housed until an appropriate placement is found, and any other pertinent details related to the event. Additionally, the CBC CEO will provide an additional notice to the RMD when a licensed or approved placement of the child has been made...

The Spreadsheet

Ms. Cowan provided a copy of the Spreadsheet provided to her by Eckerd, covering the time period of November 20, 2017 through February 6, 2018. The Spreadsheet identified 49 foster children who, for the previous seven days, had three or more placements; slept in a non-licensed bed (i.e., office, car, lobby, etc.); were placed with a relative or non-relative without an approved homestudy; or were placed in a home for sleeping only. The Spreadsheet included each child's name, date of birth, current age, current juvenile justice history, whether the child was Baker Acted in the past six months, whether the removal was due to a "lock out,"²⁴ the age of the child at their most recent removal, the primary case goal (reunification or adoption), and where the child indicated he/she wants to be placed.

²⁴ A "lock out" is when a child is not allowed back in his/her parent's home.

Refusal Protocol

On July 31, 2017, Ms. Shirley initiated the Refusal Protocol for CMOs to follow when a child refuses placement. The Refusal Protocol is as follows:

It is the expectation of Eckerd kids that no child will sleep in an office setting.

A. Process

Once a determination is made by the Case Management Organization that a child is refusing placement or for other reasons does not make it to their identified placement, the following protocol must be followed:

- 1. The CMO supervisor/designee must verbally notify their CMO Program Director.*
- 2. The CMO Program Director must verbally notify the ECA Director of Out of Home Care.*
- 3. The ECA Director of Out of Home Care must assess the situation and explore any and all options available statewide.*
- 4. The Program Director of the CMO must immediately verbally notify their Chief Operating Officer or Chief Executive Officer.*
- 5. The Chief Operating Officer or Chief Executive Officer must immediately verbally notify the ECA Executive Director to assess the situation and discuss next steps.*
- 6. Once it is determined that a child will be staying in an office setting, the CMO Program Director must complete a critical incident report.*

YFA E-mails²⁵

On March 20, 2018, Mr. Luff provided copies of YFA management e-mails in response to a request from the OIG Investigator. Of the 88,622 e-mails provided for the timeframe of November 14, 2017 through February 19, 2018, the following were pertinent to this management review:

- On November 16, 2017, YFA Program Director Marnie Keller sent an e-mail to Ms. Shirley, in which she listed two children (ages not noted) that refused placement and required supervision by a CM throughout the night on six separate dates, along with the placement(s) refused and the locations at which the children were supervised. The e-mail contained the following pertinent information:
 - October 24, 2017 – [REDACTED] (Child 15) was supervised by the CM in the Dollar General parking lot from 6:00 a.m. until transported to school (time not specified).
 - October 28, 2017 – Child 1 was supervised by the CM in the Wawa parking lot from 3:00 a.m. to 8:00 a.m.
 - October 30, 2017 – Child 15 was supervised by the CM in the parking lot of Our Loving Children (a Day Care facility) all night, until after 7:00 a.m.
 - October 31, 2017 – Child 15 was supervised by the CM in the Wawa parking lot from 12:00 a.m. until after 8:00 a.m.

²⁵ In their written response, Eckerd acknowledged being aware of “all notifications involving a child refusing to go to placements during the **evening** hours.”

- November 1, 2017 – Child 15 was supervised by the CM in the Wawa parking lot from 2:00 a.m. until after 8:00 a.m.
- November 10, 2017 – Child 1 was supervised by the CM in the Wawa parking lot from 11:00 p.m. to 8:00 a.m.
- On November 16, 2017, Ms. Gonyea sent an e-mail to Ms. Shirley regarding a report submitted to News Channel 8 on November 15, 2017, regarding a child in a CM's vehicle at the Wawa. Ms. Gonyea indicated that the report "could only pertain to one youth" and identified the child. She elaborated, "[The child]...did not want to go to this placement. We worked the [Refusal Protocol] but were unsuccessful in getting him to go...It was not considered an inappropriate placement because placement had been identified but he refused. This was communicated...via phone and/or email to the following Eckerd staff: [Ms. Thomas], yourself, [Eckerd Director of Operations Hillary Shaughnessy], Placement services. I also reported it on the Vacancy report for that week..."
- On December 8, 2017, Ms. Drew sent an e-mail to Ms. Brown reporting that she submitted an Incident Report due to an inappropriate placement because a child refused placement, and she was "checking to see if the [Incident Report needed] to be updated." The Incident Report, attached to the e-mail, read as follows, quoted in pertinent part:

Youth...received placement at 11:59pm...Youth refused saying he was not giving up his phone, was not going to be so far away, and did not want to be in a shelter. Supervisor completed refusal protocol and youth continued to refuse placement all night. Youth remained in the car with staff until he was dropped off at school at 6:38 am. [sic]

Ms. Brown responded that same date that "after speaking with [Ms. Bartlett] this morning she agreed it would be non-critical other and planned to speak with [Ms. Gonyea]..."

- On February 15, 2018, Eckerd Placement Team Supervisor Kolby Epperson responded to an e-mail from YFA CM Lattice Hill, in which Ms. Hill requested the location of another placement due to the child continuing to refuse a placement, even after an hour of the Refusal Protocol and law enforcement involvement. Mr. Epperson responded, "Please continue efforts to get her to go inside as this is her identified placement."
- On February 16, 2018, Ms. Drew sent an e-mail to incidentreport@yfainc.org and c13.IncidentReports@Eckerd.org, copying YFA Program Directors Shannon Howard, Paula Thrasher, and Ms. Gonyea, YFA Vice President of Central Programs Keith Mukherjee, and Ms. Bartlett. Ms. Drew attached a copy of an Incident Report, in which it was reported that a child (identified as [REDACTED]) did not have an approved placement on February 6, 2018 and, as a result, stayed in a daycare facility²⁶ from 3:00 a.m. until 7:00 a.m.

²⁶ According to Ms. Kirkhom, Eckerd has "drop off daycare centers" throughout the county for children to go to until placement is determined.

Eckerd E-mails

On March 6, 2018, Ms. Shirley provided a copy of an e-mail sent by Eckerd Executive Director Jody Grutza to the management of YFA, Devereux, and GCJFCS on July 31, 2017, outlining the 12-step escalating process of the Refusal Protocol. A copy of Ms. Shirley's memorandum documenting the Refusal Protocol was attached to the e-mail. The e-mail read as follows, quoted in pertinent part:

Given the continued challenges with teens refusing placements, we wanted to follow up with the following more detailed protocol... We fully recognize that the challenging teens refusing placements are causing long days/nights for staff...

- 1) *For known refusers, as soon as a placement is secured (regardless of the time of day), the staff person with the best relationship with the youth should discuss the placement and begin working with the youth to try to mitigate refusal.*
- 2) *If the youth is refusing at this time, please alert Out of Home Care immediately with additional information about where the youth is requesting to go. A potential back up option will be sought as quickly as possible but cannot necessarily be accommodated so all efforts to get the youth to the initial placement should continue.*
- 3) *The internal CMO staff person who has a relationship with the youth should continue to assist in successfully securing the youth at the identified placement...*
- 4) *Call the 24/7 Crisis Hotline at 1-844-894-9715 to...help de-escalate a current or potential crisis that could lead to law enforcement or inpatient admissions...*
- 5) ***Deploy law enforcement and document outcome... Law enforcement needs to be told that it's a violation of the lease to have a youth stay the night in the office and/or that case managers are facing a safety threat when left with a youth all night in the parking lot or car.***
- 6) *Once all steps have been completed, CMO to elevate current situation as outlined in our protocol if they haven't done so already. Note that this includes elevation at the CMO to the level of CEO as well as internal Eckerd elevation to Chief of Community Based Care.*
- 7) *CMO should be prepared to and deploy relief staff (CMO's [sic] should prepare to have 2nd shift folks on standby when we are in a situation of placing a frequent refuser that day).*
- 8) *At this time, CMO staff should plan to remain with the youth continuing to attempt to secure the youth at the placement and keep safety as the priority. The CMO should ensure that they have sufficient staff to safely supervise the youth and appropriate arrangements while continuing efforts to engage the youth. (no youth sleeping on floors).*
- 9) *The CMO must complete update [sic] Teen Profile and Incident Report documenting efforts within 24 hours of incident occurring or by next business day if on the weekend.*

- 10) *Lead agency leadership is responsible for notifying DCF via phone the evening the situation is occurring with a follow up email in writing documenting efforts.*
- 11) *Once these steps have been successfully completed, all support not directly on duty supporting the youth can return to sleep or their other personal responsibilities...*
- 12) *It is mandatory that the CMO request emergency hearing to advise assigned Judge of all incidents and refusals the immediately [sic] upon open of business the next day.*

On April 4, 2018, Eckerd Chief Information Officer Ray Wright provided copies of Eckerd management e-mails in response to a request from the OIG Investigator. Of the 7,863 e-mails provided for the timeframe of November 14, 2017 through February 19, 2018, the following was deemed pertinent to this management review:

- On November 14, 2017, Ms. Shirley sent an e-mail responding to Ms. Cowan that Eckerd would resume the Child Placement Log as requested by Ms. Cowan.

Ms. Shirley's Verbal Response

In follow-up to her May 16, 2018 verbal response, Ms. Shirley provided the following e-mails to the OIG:

- October 1, 2017 e-mail from Ms. Shirley to Ms. Gonyea and Ms. Pierre, copied to several other Eckerd staff, notifying them that they will be modifying the weekly report “to request whether or not [they] have any youth not attending school on a regular basis (regardless of reason)” and requesting that they report “which youth are refusing to attend, not enrolled, out sick for > 3 days, etc...”
- January 25, 2018 e-mail from Ms. Keller to all YFA staff regarding “several complex teenagers” not allowed at the YFA office due to threatening behavior and the protocol for “handing off” from one supervision to another. On January 26, 2018, Ms. Shirley responded requesting that Ms. Keller also address truancy reporting. On January 30, 2018, Ms. Shirley again responded, copying Mr. Luff on the response, requesting that they send Eckerd a list of children not allowed at YFA offices, then forwarded her response to former Eckerd Friends of the Children Program Director Carmi Brown,²⁷ Eckerd Chief of Staff Martin Peters, Eckerd Executive Director Brian Bostick, and Ms. Stewart, noting that if there are children that “can’t even step on YFA’s property, it would make sense that the workers are sitting with them at WAWA and other locations from the time they end their school day until they go to their respective placements. This is a serious concern and...an unacceptable practice...”
- January 26, 2018 e-mail from Ms. Shirley to Ms. Kuhn, in which Ms. Shirley provided an update on the YFA internal investigation into concerns that employees were dropping children off in the community in lieu of school. Ms. Shirley noted that YFA verified through travel logs that Child 1 and [REDACTED] (Child 17) were “dropped off at questionable destinations to include McDonald’s and the University Mall” after

²⁷ Effective February 9, 2018, Ms. Brown was no longer employed by Eckerd.

November 1, 2017; however, did not specify dates. Ms. Shirley forwarded the e-mail to YFA Chief Executive Officer (CEO) Mark Wickham at 5:01 p.m. that same date.

- January 30, 2018 e-mail from Ms. Keller to Ms. Shirley regarding five children not allowed at the YFA office, identifying Child 2 as “on the run,” to which Ms. Shirley responded on January 31, 2018 with recommendations as to statements regarding the children.

Issue 2

Did Florida Safe Families Network (FSFN) placement information accurately represent placements of children under the supervision of Eckerd?

Governing Directives

§ 39.0001(1)(a), F.S.; § 409.165(1)(a), (b), and (c), F.S.; § 409.986(1)(a), F.S.; Rule 60L-36.005, F.A.C.; Rule 65C-30.0001(80) and (88), F.A.C.; Rule 65C-43.002, F.A.C.; Attachment I, B.1.a.2), Contract #QJ3E0 between the Department and Eckerd Connects-Hillsborough (Eckerd); and Article 1:2. and Article 2:3.(b), Contract #ECA-C13-CMO-YFA-FY17 and #ECA-C13-CMO-YFA-FY20 between ECA and Youth and Family Alternatives, Inc. (YFA).

Findings

The following individuals were interviewed:

- Eckerd Chief of Community Based Care Lorita Shirley
- Eckerd Data Management Supervisor Jai-Lin Gray²⁸
- Eckerd Out-of-Home Care Director DeAndrea Thomas
- Eckerd Senior Placement Supervisor Alicia Kirkhom
- Eckerd Placement Coordinator Terenycia Little
- YFA Case Manager Supervisor (CMS) Juana Corrada
- YFA CMS Joshua Stamp
- YFA CM Ilesha Rodriguez
- YFA CM Taja Pryor
- YFA CM Nicole “Nick” Kosobud
- YFA Lead FSW Adam Childs
- YFA FSW Cydmarie Santiago
- YFA FSW Anthony Mills
- YFA FSW Tameka Carswell
- Eckerd Data Management Specialist (DMS) Jesseka White
- Eckerd DMS Gary Dreslinski
- Eckerd DMS Laura Caniglia
- Eckerd DMS Lotonya Wingfield
- Eckerd DMS Carlie Ybarra

²⁸ Effective April 16, 2018 Ms. Gray’s title changed to Director of Finance.

WITNESS TESTIMONY

Ms. Shirley testified that if a child refuses a placement or multiple placements, Eckerd will not document the refusals in FSFN; however, the CM should document a refusal in FSFN case notes, as CMs are required to document all case activity in FSFN.²⁹ A licensed foster care facility does not receive payment until a child is actually placed in the facility. If a child is in an unlicensed or inappropriate placement, there is no payment for the placement. When a child is placed in the same foster care facility on a night-to-night basis over consecutive dates, FSFN placement information will reflect the same placement information. The placement information only changes when the child is placed in a different foster care facility. A DMS on the Data Management Team³⁰ enters the placement information into FSFN. When a child is returned to his or her family via court order, it is the responsibility of the CM to notify Eckerd that the child is no longer in foster care. If the CM does not notify Eckerd in a timely manner so the Data Management Team can update the placement information, the foster care facility will continue to receive payment for the child, resulting in an overpayment, until the placement information is updated.³¹

Within the past months (unknown exact date), Eckerd created service codes in FSFN to indicate where, other than in approved placements, a child spent the night as follows: 4876 (Placement Refusal Child); 4877 (Placement Refusal Provider); and 4879 (No Appropriate Placement). The service code is entered only when the child refuses an approved placement or a foster care provider refuses the child and no other approved placement is located.

Ms. Shirley opined that the lack of documentation in FSFN regarding a child's refusal to be placed in a licensed foster care facility is a problem and stated there should be clearly defined written guidelines regarding a placement, an inappropriate placement, and a temporary placement. For example, YFA documents an inappropriate placement on the Incident Report because a child remained in a CM's vehicle for an extended period of time after refusing a placement; however, Eckerd does not classify that situation as an inappropriate placement because an appropriate placement was available.³² Ms. Shirley opined that the June 22, 2016 Department memorandum language, "until an appropriate placement is found," insinuates that an appropriate placement is not available; however, in these situations, the child may have refused an available appropriate placement.

Eckerd is required to look for an appropriate placement until one is found, but if a child refuses the placement, Eckerd is not required to search for another.³³ Most of the children that refuse placement prefer to be supervised by a CM at another location rather than stay at a licensed foster care facility. Ms. Shirley expressed frustration at the lack of law enforcement authority to deal with children who repeatedly refuse placement without legitimate reasons and know there are no consequences for doing so.

²⁹ This testimony was updated in response to Ms. Shirley's verbal response and Eckerd's written response.

³⁰ The Data Management Team is comprised of Ms. Gray and six DMSs.

³¹ The CM typically updates the information in the Community Based Resource Information System (CoBRIS).

³² In her verbal response, Ms. Shirley clarified that it is not appropriate for a child to sleep in a vehicle.

³³ In her verbal response, Ms. Shirley explained that if a child identifies a specific and legitimate reason for the refusal, Eckerd will continue de-escalation efforts and search for another placement. If the child does not specify a reason for the refusal, Eckerd is not required to search for another placement.

Ms. Gray advised that she supervises the Data Management Team, a staff of six DMSs responsible for updating FSFN. Her office operates from 7:00 a.m. until 5:00 p.m., Monday through Friday. When her office receives case assignments, case closures, case manager assignments, and placement notifications, they update the child's information in FSFN. Pertaining to foster care, Ms. Gray's office receives the data utilizing CoBRIS.

When a child is placed after 5:00 p.m. on Friday, the placement would not be entered in FSFN until sometime the following Monday. However, Ms. Gray confirmed that the CM would have 48 hours (two business days) to complete the CoBRIS reports and the Data Management Team would also have 48 hours to enter the data into FSFN from the time they receive it from CoBRIS, so the placement of a child technically does not have to be entered in FSFN until 96 hours (four business days) after the placement occurs. The Data Management Team only has knowledge of a placement from the CoBRIS reports, not the circumstances surrounding the placement or events prior to the placement.

Within CoBRIS are two sets of reports: an Edit Report for non-licensed care placements and a Match Report for licensed care placements. These reports contain the details on the locations from which the child is coming and going, demographic information on the child, and any other pertinent information. The Data Management Team receives the CoBRIS reports via an e-mail distribution list from the Eckerd Placement Team (Match Report) or the CMOs (Edit Report) and, based on the CMO assigned to the case, the DMS will pull the report from the e-mail distribution list and enter the data manually into FSFN. The only data automatically populated in FSFN is the data on case removal. The placement data is pulled by the DMS from the e-mail notification and entered in FSFN as written.

If the DMS discovers an error in the data or there are missing reports, they are not allowed to make the necessary corrections and FSFN will not allow a placement entry until the placement information is up to date. The DMS sends an e-mail request for clarification and/or corrections to the Eckerd Placement Team (Match Reports) or the CMO (Edit Reports). The e-mail requests are sent to the Eckerd Placement Team member who completed the Match Report and to the CM, CMS, and assistant program director for the CMO for Edit Reports, requesting the information as soon as possible. The DMS documents the requests on the discrepancy log that is e-mailed daily to the Eckerd Placement Team, Eckerd Placement Team supervisors (Ms. Kirkhom and Mr. Epperson), and Eckerd director for licensed providers (Tami Lewis) and to the assistant program director and program director of the CMO for non-licensed providers. This practice was implemented in July 2017 and either Ms. Gray or Ms. Caniglia e-mails the discrepancy log. Although the e-mailed requests require a response within 24 hours, there are times several requests must be made because the CMOs do not reply within the requested time. After the data is entered in FSFN, Ms. Gray conducts a weekly supervisory review by selecting a random sample from completed FSFN entries and reviewing for accuracy. The only data entered in FSFN by the Data Management Team is the placement data, case assignment, and child demographic information. They cannot delete a placement entry in FSFN, so they must enter "Placement Made in Error." The placement made in error defaults to the date the placement began.

In 2016, Eckerd implemented two FSFN placement codes (for Eckerd use only) because of foster children sleeping in CMO offices: 4636 (Visitation-Teen Center) and

4367 (Visitation-Case Manage Org). In 2018,³⁴ Eckerd developed three additional service codes to more clearly identify the reason the two Visitation codes were used: 4876 (Placement Refusal Child); 4877 (Placement Refusal Provider); and 4879 (No Appropriate Placement). Ms. Gray subsequently (unknown exact date) identified placements in FSFN that were documented as 4637 (Visitation-Case Manage Org) and amended them to “Placement Made in Error,” identified which placement type fit the actual placement from the three “Other” categories, and chose a placement type from the three new codes that more accurately depicted what happened with the child.

Ms. Thomas indicated that any licensed foster care placement is reported to the Eckerd Placement Team, which is responsible for providing the placement information to the Data Management Team so the information can be entered into FSFN. When a child is moved from one licensed placement to another, Eckerd Out-of-Home Care staff complete a Match Report and submit it via CoBRIS to the Data Management Team. There may be a delay from the time Eckerd Placement Team staff document the placement information in the Match Report until it is entered in FSFN by the Data Management Team. For example, if a foster care placement occurs on a Friday and the Match Report is submitted that same day, the earliest the placement information would be documented in FSFN would be the following Monday or Tuesday. The Data Management Team has 48 hours (two business days) to enter the information in FSFN and does not work on weekends. The information on the Match Report is not reviewed by a supervisor prior to submission to the Data Management Team.

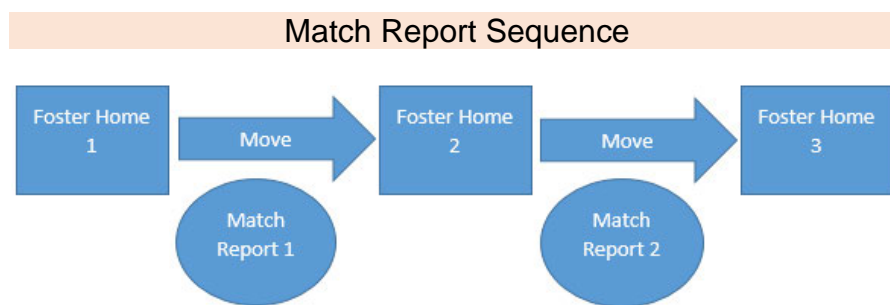
Ms. Kirkhom said that once placement is determined, the CM or a transporter will pick up the child from supervision and transport them to the placement. G-Men Services developed and uses their own documentation form, which either the CM or transporter signs when a child is dropped off or picked up from supervision. A copy of the form is given to the CM or transporter and subsequently submitted to Ms. Thomas. Eckerd does not maintain any documentation reflecting the location of the child from the time the child leaves school until they arrive at placement.

Placement coordinators document placement changes in CoBRIS by completing a Match Report, which is submitted to the Data Management Team. Ms. Kirkhom does not review the Match Reports for accuracy prior to their submission because FSFN will not allow a placement entry to be documented unless there is a “removed from” entry. For a new placement to be added, the “removed from” address must match the previous placement address. When a new entry is made (except for the initial removal), FSFN auto populates the “removed from” data from the previous placement data.

For example, if a child in Foster Home 1 is moved to Foster Home 2, then subsequently moved to Foster Home 3, a Match Report must be completed for each move. If a placement coordinator submits a Match Report for the move from Foster Home 2 to Foster Home 3 but a Match Report was not completed and the placement data not entered into FSFN for the move from Foster Home 1 to Foster Home 2, FSFN will not allow placement data to be entered for the move from Foster Home 2 to Foster Home 3 (see below). The DMS entering the Match Report will notify Ms. Kirkhom via e-mail that a Match Report was not completed for the move from Foster Home 1 to Foster Home 2

³⁴ According to a January 26, 2018 e-mail from Ms. Gray to the Data Management Team regarding implementation of the service codes, the codes were implemented on January 26, 2018.

and she will locate the placement coordinator responsible to have them complete the Match Report.



Ms. Little explained that she is one of four placement coordinators assigned to the day team (9:00 a.m. until 6:00 p.m.). There is also a night team of two placement coordinators (4:00 p.m. until 1:00 a.m.), one placement coordinator that works from 1:00 a.m. until 8:00 a.m., and one placement coordinator that covers the weekend.

For placements involving a CMO on the day shift, she notifies the CM by e-mail that an approved placement has been located. If the child is dropped off at the placement location and there are no issues, she usually does not hear anything from the CM. The next morning, she calls the foster care provider, verifies the child spent the night, and checks whether there are any issues. Once she has completed the verification the next day, she completes a Match Report, which is expected to be submitted in CoBRIS by 12:00 p.m. the day following the placement. Match Reports are not completed when the placement is initially found. Once the placement is located for a child that is the child's approved placement. If a child refuses placement, it is up to the CM to follow the Refusal Protocol. Ms. Little usually does not find a second placement for the child because she works the day shift and the search will carry over to the night shift. A placement in a foster care facility should not be listed in the placement tab if the child did not stay there, and the placement should be verified when the placement coordinator contacts the foster care provider, no later than 12:00 p.m. the following day.

If the CM brings the child back to their office because the child refused placement, she believes it is the CM's responsibility to complete an Edit Report to notify the Data Management Team where the child spent the night. She also believes that once a child has refused placement and the Refusal Protocol failed, the CMO takes over the placement.³⁵ There is no documentation for attempted placements.

Ms. Corrada related that from time to time, until a permanent placement can be obtained, a child in foster care moves from one foster home to another on a nightly basis. YFA is not responsible for finding placements; Eckerd locates the placement and the CM or FSW transports the child to the placement. In circumstances where a child is placed with a relative, the CM would notify Eckerd (via e-mail) of the placement, but all licensed foster care placements are handled through Eckerd. Any time a child refuses placement, the CM notifies the Eckerd Placement Team so another placement can be located. It is the CM's responsibility to maintain supervision of the child until another placement is secured. Most of the placement issues occur during the night and, in some instances, if a placement is not found the child stays in the vehicle with the CM

³⁵ In their written response, YFA indicated that they are "not the child placing agency and [do] not take over the placement when a child has refused placement and the Refusal Protocol has failed..."

overnight. Within the past six months,³⁶ Eckerd initiated a Refusal Protocol, which outlines the procedures the CM must follow each time a child refuses placement. Ms. Corrada never documented a child refusing a placement on the Eckerd Incident Report. Typically, a child refusing placement is not documented in the FSFN case notes. If a placement issue occurs during the night, the on-call supervisor is notified (via cellular telephone or text message) and that supervisor notifies YFA management and sends an e-mail to Eckerd management (not identified) regarding the placement issue.

Mr. Stamp is responsible for supervising up to six CMs. He said that Eckerd locates placements for foster children and YFA manages the placement. Once Eckerd locates a licensed placement and the child is placed, the CM enters an Edit Report in CoBRIS so that Eckerd is notified of the updated placement information. He believed that YFA has 48 hours to update CoBRIS and submit the placement to Eckerd. If a placement was not entered within 48 hours, the Eckerd Placement Team sends an e-mail notification to the CM and CMS that a placement was not entered in CoBRIS. CoBRIS is updated that same date and Eckerd is notified that CoBRIS is updated. Eckerd usually discovers if a placement is not in the system when it is time to pay a foster home. Mr. Stamp conducts supervisory reviews of placements by reviewing the placement tab in FSFN. If the placement tab is incorrect, he will notify the CM to determine whether the CM has not updated CoBRIS or if Eckerd has not updated FSFN. If Eckerd has not updated FSFN, he will either have the CM resubmit an Edit Report in CoBRIS or he will do so himself. After the resubmission, if Eckerd has still not updated FSFN within 48 hours, he will contact the Eckerd Placement Team directly.

If a foster parent refuses to accept a child, typically the CM and the child return to the office and wait for Eckerd to find a different placement. When this occurs, he documents the refusal as a note to file in FSFN, and whether it was a refusal by the foster parent or the child; however, he does not document that a CM waited with the child at their office while a secondary placement is located. When they have an incident with a child, the CM completes an Incident Report and submits it to the CMS, the CMS submits the report to the assistant program director, and the assistant program director submits the form to YFA Quality Improvement Coordinator (QIC) Kelly Pelaez, who in turn submits the form to Eckerd.³⁷ If there is an incident specifically related to placement, he will report it either by telephone or e-mail to both his assistant program director and the Eckerd Placement Team prior to submitting the Incident Report. In his opinion, YFA keeps in good contact with Eckerd concerning placements.

Ms. Rodriguez said that when a child is moved from a foster home to another foster home, respite, or the Department of Juvenile Justice (DJJ), the CM enters the movement in CoBRIS by completing an Edit Report. If the placement is long term, CMs are responsible for completing the Edit Report; however, if the placement is night-to-night, Eckerd completes the Edit Report. The Edit Report is entered in CoBRIS and forwarded to Eckerd, who updates FSFN. CoBRIS is only updated with the final drop-off location of the child. Attempts to place a child at different foster homes are not documented in FSFN.

Ms. Pryor has been employed as a CM for approximately two years and is required to be on call on a rotating basis. There are times when she transported a child to a

³⁶ Determined by records review to be in July 2017.

³⁷ Mr. Stamp was not aware of the identity of the individual to whom Ms. Pelaez submitted the form.

placement and the child has refused the placement. When this occurs, she notifies the CMS, who in turn notifies the program director, and the notification continues up the chain of command to the Department. She also initiates the Refusal Protocol. When she is on call, she does not document the child's refusal in FSFN (case notes or elsewhere), but the child's refusal is documented on an Incident Report, because the child would have to remain with the CM or FSW for an extended amount of time until another placement is found. During the daytime, if the child is not in school and does not have a placement, the child is transported to the YFA office, where the child is supervised until a placement can be located. The placement is typically documented in CoBRIS, which automatically updates the placement information in FSFN.³⁸ Within the last month (approximately early to mid-February 2018), YFA instituted a Transfer of Youth Supervision Form (TYSF), which is signed by the receiving caregiver each time a child is transferred from one supervision to another, such as a foster home, school, etc. The TYSF is maintained in the client case file.³⁹

Ms. Kosobud stated that Eckerd finds the licensed foster care placement and the notifications for the placement go through the chain of command at YFA, usually by e-mail. Once the child is placed in a licensed foster care, he will edit the placement information in CoBRIS. This is not reviewed by a supervisor prior to being sent to Eckerd. Once Eckerd receives the update, he will receive an e-mail acknowledging such. When a child refuses placement, after following the Refusal Protocol and if placement is still refused, Eckerd will begin looking for a new placement. While Eckerd is locating a new placement, he is responsible for the child. He said CMs would bring children back to the office; however, after children began being destructive, CMs were not allowed to bring children to the office anymore (unknown exact date), which led to children sitting in vehicles depending on where the CMs were and what they were doing. Wawa became the more popular choice because they had Wi-Fi and the YFA office does not have Wi-Fi. CMs are supposed⁴⁰ to document case-related information in FSFN; however, the case notes are not completed every time. The information is supposed to be documented in the comments section on the TYSF, which is submitted to either the CMS or assistant program director. Mr. Kosobud did not receive any policies or training on the TYSF. The only thing documented on the TYSF is the "official" placement, not the attempted placements. The attempted placements are also not documented in FSFN. To the best of his knowledge, the refusals are only documented via e-mail between Eckerd and YFA as a method of notification. Once everybody in the chain is notified, the CM waits to hear from Eckerd of a new placement. This usually takes hours and the CM may choose to wait in the community because they do not want to move around too much and because of the location of any potential new placements.

He explained that if he must keep a child in his vehicle at Wawa because a placement has not been identified, he notifies his supervisor by text message or e-mail. It is not YFA policy to document in CoBRIS that they parked at a Wawa overnight with a child. When completing the CoBRIS screen, there is a drop-down box for placement type and a CM must choose from the selections in the drop-down box. There is not a selection titled "Other" for a CM to select a placement to indicate a child was anywhere other than an approved placement. If he selected the original location of the placement and

³⁸ Through witness testimony, it was determined by the OIG that CoBRIS does not auto populate into FSFN.

³⁹ Mr. Childs testified that the TYSF is submitted to Eckerd Data Entry Specialist Heather Bradshaw.

⁴⁰ CFOP 170-9 requires that case managers update FSFN case notes within two business days.

documented in the “note section” in CoBRIS that the child did not stay at the original placement, but in a vehicle at a Wawa, then CoBRIS would be inaccurate because the “note section” in CoBRIS would be different from the placement drop-down box. If a selection is not made from the drop-down box, then a CM cannot progress in the system. He confirmed that CMs are restricted as to what they can enter in CoBRIS. When he completes an Eckerd Incident Report, the report is passed on to the CMS and the assistant program director. After review, they are sent to Eckerd. He does not report any incidents directly to Eckerd.

Although Mr. Childs has not personally experienced it, if a child refused to go to a foster home he would have the foster parent sign the TYSF documenting that he (Mr. Childs) was there. He would document in the comment section that the child refused the placement. He only documents the placement of the child and does not document what he does with a child in between placement attempts. He explained that FSWs are permitted to take children to any public place to pass the time between placements. The TYSF form is submitted to Ms. Bradshaw, who began collecting the forms a couple of weeks ago (approximately early to mid-February 2018). Prior to that date, he (Mr. Childs) would collect the forms and review them for accuracy and completeness. If there is a problem placement, he notifies the CM and CMS. He enters the FSWs’ visitation and cancellation notes into FSN, but does not enter any placement data and his staff is not authorized to enter data into FSN. He does not enter any data into CoBRIS. Neither he nor his staff received any policies, procedures, or guidelines on how to complete the TYSFs or appropriate locations to take children while waiting for placements.

Ms. Santiago, Mr. Mills, and Ms. Carswell confirmed they receive their assignments from the CMS via text message instructing who they will be transporting, the placement information, and the times they are to be transported. They transport children and supervise visits. They do not have access to FSN to document information. The TYSF was implemented a few weeks prior to the interviews (approximately early to mid-February 2018). If the TYSF is not already completed by a CM when they receive their assignments for the day, they will complete it. They document in the comment section if a child is injured while under their supervision, a foster parent refuses a child, or the child refuses the placement. When a child is dropped off at a placement, they have the foster parent sign the form. After completing the TYSF, they deliver the form to Ms. Bradshaw, who files the form in the case file. If there is a gap in time from when they pick up a child to when the child is dropped off at their placement, they bring the child to the YFA office. When this occurs, they do not document it. They have never been instructed on locations they cannot take a child while waiting for a placement.

Ms. White is responsible for group homes and invoicing of licensed foster care providers. The Eckerd Placement Team completes a Match Report in CoBRIS for licensed providers and the CMO creates an Edit Report for non-licensed providers. If there is a gap in time between the placement of a child and the entry of that placement information into FSN, it is due to a delay in the Data Management Team receiving the information from the Eckerd Placement Team and/or CMO. Once an entry is made in CoBRIS, CoBRIS generates an automated e-mail notification (distribution list) to the Data Management Team and she is required to check the distribution list periodically throughout the day for new entries into the CoBRIS system. If there is a Match Report or Edit Report, she will enter the report data into FSN. When she discovers a

discrepancy, she sends an e-mail to the CM and a copy of the e-mail to Ms. Gray, the Eckerd Placement Team, Ms. Thomas (the Eckerd Placement Team Supervisor), and the CMS. On occasion, she will telephone the CMS directly to let them know she is missing information. Though she believes they exist, Ms. White was not issued any policies, procedures, or guidelines advising her what to do when there is a discrepancy.

During the review of FSFN records, the OIG observed that Ms. White made eight placement entries on a single date (January 12, 2018) in the case of [REDACTED] (Child 16). When asked about the entries, Ms. White responded that they were completed so that FSFN would match the invoice for the licensed provider. The provider notified her that Child 16 was not in their facility because he was either arrested or Baker Acted, which would require the CMO⁴¹ to file an Edit Report. As a result, she had to document eight CoBRIS edits in FSFN. She verified that Child 16's placement was not properly documented in FSFN because FSFN did not have the non-licensed placement locations when Child 16 was in custody. When Child 16 was Baker Acted or arrested, the provider should have notified the CM, who should have completed an Edit Report so the Data Management Team could update FSFN.

Mr. Dreslinski is responsible for entering data he receives from YFA and GCJFCS through CoBRIS into FSFN. Licensed provider information is received from the Eckerd Placement Team via a Match Report in CoBRIS, and non-licensed provider information is received from the CMO via an Edit Report in CoBRIS.

When asked if there were instances in which a child was placed and he was not notified until three or four weeks later, Mr. Dreslinski responded, "Oh yeah, but it is much better." Between November 14, 2017 and February 19, 2018, there were occasions in which the Eckerd Placement Team submitted placements later than the 48-hour requirement. There are times he is notified of a placement change, but when he attempts to enter the change he cannot do so because the prior placement was not entered in FSFN. When this discrepancy is identified, he sends an e-mail to the Eckerd Placement Team requesting the missing information and documents the discrepancy in the discrepancy log. YFA is not submitting the placement information within the 48-hour period. For example, he will discover a child is a runaway and must request an Edit Report from the CM so he can update FSFN. When a missing child is located, it is the CM's responsibility to complete an Edit Report so FSFN can be updated. Ideally, he should be notified by both the CMO and the Eckerd Placement Team.

OIG Note: During analysis of FSFN records, significant lags in entry of placement information were identified (see below). A sampling of cases was followed up on with interviews of the Eckerd Data Management Team to determine the cause(s) of the lags.

FSFN Case ID #	Child	Placement Begin Date	FSFN Entry	# Days Lag
101517824	[REDACTED]	November 13, 2017	February 19, 2018	98
50509	[REDACTED]	December 9, 2017	March 13, 2018	94
100482949	[REDACTED]	November 9, 2017	January 29, 2018	81
100810946	[REDACTED]	January 10, 2018	March 13, 2018	62
82741	[REDACTED]	November 8, 2017	January 8, 2018	61
101298015	[REDACTED]	January 3, 2018	March 1, 2018	57

⁴¹ The CMO in this case was YFA.

FSFN Case ID #	Child	Placement Begin Date	FSFN Entry	# Days Lag
100707340	[REDACTED]	December 12, 2017	February 6, 2018	56
101328007	[REDACTED]	November 16, 2017	January 8, 2018	53
104065	[REDACTED]	November 21, 2017	January 12, 2018	52
101080022	[REDACTED]	December 3, 2017	January 23, 2018	51
100465949	[REDACTED]	December 4, 2017	January 24, 2018	51
145272	[REDACTED] (Child 18)	January 22, 2018	March 14, 2018	51
145272	[REDACTED] (Child 19)	December 7, 2017	January 25, 2018	49
100122327	[REDACTED]	December 7, 2017	January 24, 2018	48
101681200	[REDACTED]	December 13, 2017	January 30, 2018	48

Ms. Caniglia explained that in FSFN Case #101517824, the 98 days between the placement begin date and the entry of the placement information into FSFN was due to waiting for an out-of-state foster home to be approved. Once the home state approved the foster home and she received the information, Ms. Caniglia updated FSFN to reflect the placement status.

Eckerd DMS Lotonya Wingfield explained that in FSFN Case #50509, the 94 days between the placement begin date and the entry of the placement information into FSFN was due to a delay in receiving a placement update from the Eckerd Revenue Management Team. She explained that the placement change was related to an adoption and when the adoption was approved, the placement data had to be backdated to the original placement date of December 9, 2017.

Eckerd DMS Carlie Ybarra explained that in FSFN Case #100482949, the 81 between the placement begin date and the entry of the placement information into FSFN was due to the foster home licensing provider notifying Circuit 6 instead of Circuit 13 of the placement change.

Ms. Ybarra explained that in FSFN Case #100810946, the 62 days between the placement begin date and the entry of the placement information into FSFN was not the result of a change Eckerd made. The placement change was documented by HQ OPS Government Operations Consultant I Keta Monroe and was due to a reclassification of the provider so the provider would qualify for compensation.

According to Ms. Caniglia, these four placement changes were all related to adoptions or reclassification of the provider so they could receive a different level of compensation. There was no interruption in placement and in each case, the Data Management Team confirmed that the child was in the placement as entered.

Ms. Gray provided explanations for the remaining cases as follows:

- In FSFN Case ID #82741, the 61 days between the placement begin date and the entry of the placement information into FSFN was due to an Edit Report listing the provider as "The Grove," when the child was actually placed at the Chrysalis Center (also known as "The Grove"). The discrepancy was discovered during the invoicing process by the Data Management Team, who requested an Edit Report and documented it on the discrepancy log. In this case, the FSFN

⁴² It is unknown whether this is Child 7 or Child 13.

data did not accurately represent the placement for the child until the correction was made.

- In FSFN Case ID #101298015, the 57 days between the placement begin date and the entry of the placement information into FSFN was due to a retroactive rate increase for the out-of-state placement provider because of the child's age. As placement data cannot be deleted, when ICPC notified Eckerd of the correct pay rate, the Data Management Team had to enter a "placement made in error," then re-enter the placement information with the correct rate information.
- In FSFN Case ID #100707340, the 56 days between the placement begin date and the entry of the placement information into FSFN was due to a rate correction, which can only be made by re-entry of the placement information.
- In FSFN Case ID #101328007, the 53 days between the placement begin date and the entry of the placement information into FSFN was due to a Match Report with the wrong date (November 13, 2017), so the Data Management Team requested a corrected Match Report (with November 16, 2017) from the Eckerd Placement Team and documented such on the discrepancy log. The Eckerd Placement Team responded with the corrected date; however, did not include a corrected report. Because a corrected Match Report was never received, the Data Management Team entered the date that the Eckerd Placement Team provided in their response to the request for the Match Report.
- In FSFN Case ID #104065, the 52 days between the placement begin date and the entry of the placement information into FSFN was due to the CMO not submitting an Edit Report for a placement change on November 21, 2017 until January 8, 2018. In this case, the FSFN data did not accurately represent the placement for the child until the correction was made.
- In FSFN Case ID #101080022, the 51 days between the placement begin date and the entry of the placement information into FSFN was based on the provider being due a different rate of payment resulting from an increase in the age of the child, which was noticed during the processing of an invoice. FSFN does not automatically adjust rates of pay; therefore, the Data Management Team created a new placement with the correct rate of pay. The child did not move from the placement that was listed in FSFN.
- In FSFN Case ID #100465949, the 51 days between the placement begin date and the entry of the placement information into FSFN was due to a Match Report with an incorrect end date (November 5, 2017 instead of November 4, 2017). A new Match Report was requested and documented on the discrepancy log.
- In FSFN Case ID #145272 (Child 18), the 51 days between the placement begin date and the entry of the placement information into FSFN was due to the CMO failure to submit an Edit Report. The Data Management Team requested an Edit Report on January 22, 2018 and January 29, 2018, and documented it on the discrepancy log. The issue was resolved on March 13, 2018. In this case, the FSFN data did not accurately represent the placement for the child until the correction was made.
- In FSFN Case ID #145272 (Child 19), the 49 days between the placement begin date and the entry of the placement information into FSFN was due to the listing

of the incorrect group home (Peak 3 instead of Peak 1) on the Match Report by the Eckerd Placement Team. A corrected Match Report was requested and documented on the discrepancy log by the Data Management Team.

- In FSFN Case ID #100122327, the 48 days between the placement begin date and the entry of the placement information into FSFN was due to a correction in the placement type, which was initially listed as “Visitor Case Management Org,” but had to be reclassified to “Placement Refusal Child” to better document the placement refusal by the child.
- In FSFN Case ID #101681200, the 48 days between the placement begin date and the entry of the placement information into FSFN was due to human error, in that the date entered in FSFN was December 13, 2013 instead of December 13, 2017

RECORDS REVIEWED

Contract #QJ3E0 Amendment #0022 (Effective July 1, 2017)

Section 1.5.1.1. provides, quoted in pertinent part, “...The Lead Agency shall ensure that FSFN is updated within two (2) working days for standard case work of any changes known to the Lead Agency or its Case Management Organizations.”

Placements Reported on the Spreadsheet

The OIG conducted an analysis of FSFN data for 35 placements identified by Ms. Cowan as problematic, based on her review of the Spreadsheet submitted to her by Eckerd on a weekly basis. The analysis revealed the following pertinent information:

FSFN Case ID#	Child	Placement Begin Date	FSFN Accurate?	Discrepancy
38953	██████████ (Child 20)	January 19, 2018	No	FSFN was not updated with child's refusal of placement. The placement information was listed as Statewide Visitation Provider.
101737297	██████████	December 8, 2017	Yes	
101737297	██████████	December 8, 2017	Yes	
101736345	██████████	December 7, 2017	Yes	
2588945	██████████	January 13, 2018	No	Placement data was not entered into FSFN until February 19, 2018.
100579176	Child 1	January 19, 2018	No	Case Note ID #160598773, entered on January 24, 2018, indicated that the child refused placement and spent the night in a van with the CM; however, placement information indicated Joshua House. In addition, FSFN placement information recorded Hillsborough County DJJ for February 8, 2018; however, case note indicates Pasco County DJJ.
101151670	Child 4	January 30, 2018	No	Case Note ID #160702602 indicated that the child was a runaway as of 8:00 p.m. on January 30, 2018; however, FSFN placement information reflected placement with James Bernadette from January 11, 2018 through February 2, 2018.

FSFN Case ID#	Child	Placement Begin Date	FSFN Accurate?	Discrepancy
2105822	Child 16	January 20, 2018 January 30, 2018	No	For January 20, 2018, FSFN reflected Statewide Visitation Provider and was not updated with the child's refusal of placement, which was documented in Case Note ID #160903269. For January 30, 2018, FSFN placement information reflects that the child was placed with licensed foster parent Ruby Sanderson; however, Case Note ID #160720193 reflects that the child was transported to the residence of Will Desinor. ⁴³
2105822		October 25, 2017	Yes	
2105822		October 27, 2017	Yes	
100434535		January 1, 2018	Yes	
100434535		January 1, 2018	Yes	
100434535		January 1, 2018	Yes	
100434535		January 1, 2018	Yes	
54549		December 19, 2016	Yes	
2363453	Child 17	December 19, 2016	Yes	
101334508		January 11, 2018	Yes	
101334508		January 11, 2018	Yes	
54549		December 19, 2016	Yes	
61042		October 11, 2017	Yes	
136064		August 3, 2017	Yes	
101328007		November 11, 2017	Yes	
3167360		December 5, 2017	Yes	
101334508		January 11, 2018	Yes	
101334508		January 11, 2018	Yes	
101334508		January 11, 2018	Yes	
101334508		January 11, 2018	Yes	
101334508		January 11, 2018	Yes	
101334508		January 11, 2018	Yes	
100464788	Child 8	July 9, 2016	Yes	
100464788	Child 6	September 16, 2015	Yes	
100609190		December 12, 2017	Yes	
61042		October 11, 2017	Yes	
61042		October 11, 2017	Yes	
100119278	Child 5	May 20, 2016	Yes	

FSFN Placement Analysis

Ms. Cowan provided an ad hoc CARS Active Children Receiving Services report of all children in the care of Eckerd as of February 26, 2018. Of the 1,028 children, 436 experienced new or changed placements from November 14, 2017 through February 26, 2018.⁴⁴ As a result, the OIG then reviewed 2,234 Eckerd placement entries of children

⁴³ Mr. Desinor owns G-Men Services.

⁴⁴ The OIG reviewed placements under YFA, Devereux, and GCJFCS.

removed from their home on or before February 15, 2018, who experienced a new or change of placement from November 14, 2017 through February 26, 2018, as follows:

CMO	# of Children	# of Placement Entries
YFA	180	1,059
GCJFCS	101	561
Devereux	103	614

Twelve placements were identified in which FSFN had incorrect or missing placement information for placements made from November 14, 2017 through February 19, 2018, as follows:

FSFN Case ID #	Child	Placement Begin Date	Case Note ID #	Discrepancy
145272	Child 18	December 15, 2017	160953393	Placement information missing
101151670	Child 4	January 30, 2018	160702602	Placement information missing
100122327	██████████	December 7, 2017	██████████	Placement information missing
2105822	Child 15	January 20, 2018	160903269	Placement information missing
2105822	Child 15	January 30, 2018	160694271	Placement information missing
100974519	██████████	November 30, 2017	159949506	Incorrect/Missing placement information
101733996	██████████	February 9, 2018	160871948	Placement information missing
101733996	██████████	February 9, 2018	160871948	Placement information missing
6508390	Child 14	February 8, 2018	160845469	Placement information missing
101763228	██████████	February 1, 2018	16073309	Placement information missing
101763228	██████████	February 1, 2018	16073309	Placement information missing
100335443	Child 11	January 20, 2018	██████████	Placement information regarding runaway is missing

Six placements were identified in which FSFN case notes contradicted the placement data for placements made from November 14, 2017 through February 19, 2018, as follows:

FSFN Case ID #	Child	Date and Time	Case Note ID #	Case Note Information	Placement Tab Information
2390995	██████████ ██████████ ██████████	January 3, 2018 5:00 p.m.	160323012	"CM picked the children up from Blessed Beginnings Academy to the Storey Foster Home. Each child a suitcase [sic] of their belonging...Storey Foster Home ██████████..."	Licensed Provider Kayla Storey ██████████ January 2, 2018 through January 6, 2018
115652	██████████	December 12, 2017 2:29 p.m. December 13, 2017 2:25 p.m.	160110324 160110344	CM documented telephone contact with the child's mother, in which she advised there was an active warrant for the child, deputies were dispatched, and the child was taken into custody and kept overnight. CM documented telephone contact with DJJ informing that the child was released from the secure location to home detention but not picked up by the father.	No placement documented for December 12, 2017

⁴⁵ It is unknown whether this is Child 7 or Child 13.

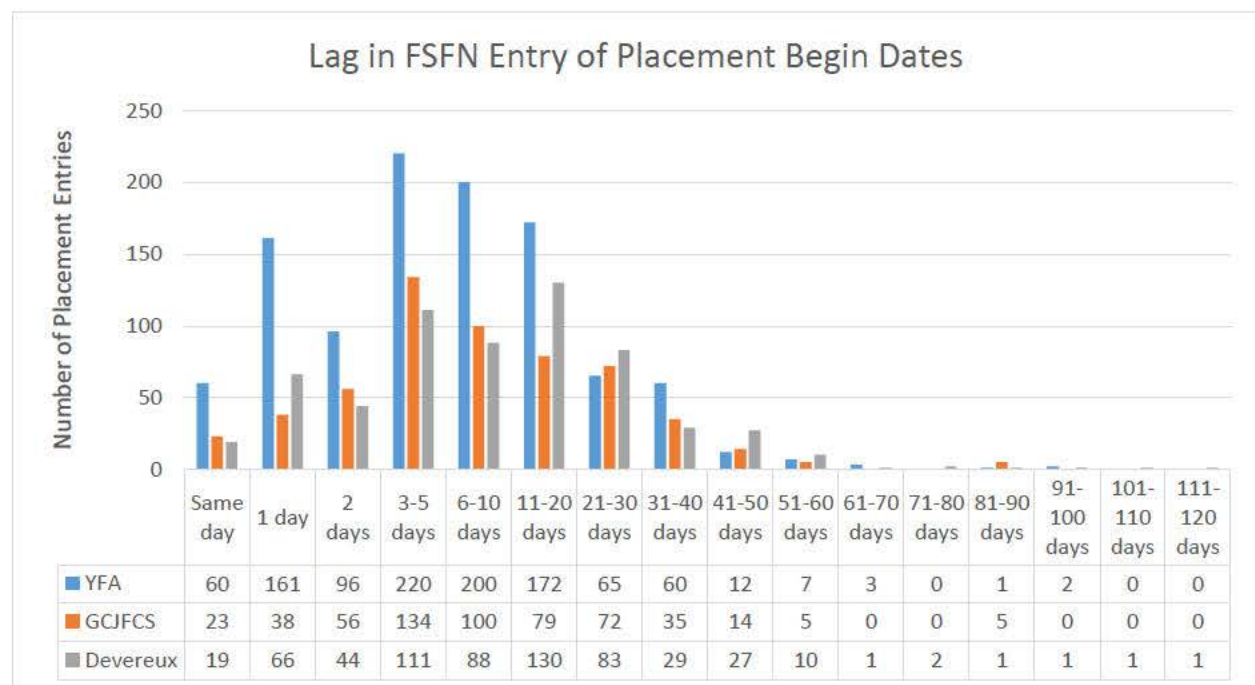
FSFN Case ID #	Child	Date and Time	Case Note ID #	Case Note Information	Placement Tab Information
101456238	██████████	November 15, 2017 3:42 p.m. December 6, 2017 6:38 a.m. December 18, 2017 6:05 p.m.	159632883 159899539 160149648	CM conducted a home visit to the child's current residence at ██████████ where she saw the caregiver "Clarice Jorge." CM conducted home visit to the child's current residence at ██████████ CM conducted home visit to the child's current residence at ██████████	Licensed Provider Melissa Minsal ██████████ August 9, 2017 through December 18, 2017 Licensed Provider Ruby Sanderson ██████████ December 18, 2017 through December 19, 2017
101710982	██████████	December 27, 2017	160405020	"CM dropped ██████████ off to the home of Lynette and John Crawford.. ██████████ ██████████ ..."	Licensed Provider Joanne Colon-Thaler ██████████ December 22, 2017 through January 1, 2018
100444312	██████████	December 22, 2017 9:00 a.m.	160163981	CM documented "Field Visit – Other; Field Visit – School/Daycare" with ██████████ and noted, "...child has been taken to New Beginnings from the dates of 12/18 – 12/21. On 12/19...taken to an overnight placement. The child was last dropped off... with...Ashley hall (G-Man Services) until placement is established (12/22/2018)..."	New Beginnings Youth Shelter December 18, 2017 through December 22, 2017

One placement was identified in which FSFN placement information was not accurate because the child refused the placement and the placement data was not amended to show the child refused, resulting in an overpayment to the provider. Eckerd received an overpayment of \$579.69 for service beginning on January 19, 2018 and ending on January 21, 2018. The OIG determined that the overpayment has been repaid and was approved on February 20, 2018.

FSFN Case ID #	Child	Date and Time	Case Note ID #	Case Note Information	Placement Tab Information
100579176	Child 1	January 20, 2018 2:30 a.m. January 20, 2018 4:40 a.m. January 20, 2018 8:00 a.m.	160919940 160903169 160598773	Child 1 and Child 11 were refusing placement at Joshua House. Child 1 "...refused the entire morning and slept in the van...picked up around 805am [sic] by another YFA staff..." Child 1 refused placement at Joshua House and "wanted to go to an Aunt." CM arrived at Joshua House to pick up Child 1 and another child and "was informed...that both youth had refused placement at Joshua house and had slept in the transport van that night..."	Joshua House January 19, 2018 through January 22, 2018

The OIG identified 1,671 (74.8%) placements in which the placement information was not added to FSFN within 48 hours. The timeliness of entry of placement information for the 2,234 placement entries of children removed from their home on or before February 15, 2018, who experienced a new or change of placement from November 14, 2017 through February 26, 2018, is as shown in the following table and chart:

Number of "Begin Placement" Entries					
Begin Placement - FSFN Entry Lag	YFA	GCJFCS	Devereux	Total	Percent of Total
Same day	60	23	19	102	4.57%
1 day	161	38	66	265	11.86%
2 days	96	56	44	196	8.77%
3-5 days	220	134	111	465	20.81%
6-10 days	200	100	88	388	17.37%
11-20 days	172	79	130	381	17.05%
21-30 days	65	72	83	220	9.85%
31-40 days	60	35	29	124	5.55%
41-50 days	12	14	27	53	2.37%
51-60 days	7	5	10	22	0.98%
61-70 days	3	0	1	4	0.18%
71-80 days	0	0	2	2	0.09%
81-90 days	1	5	1	7	0.31%
91-100 days	2	0	1	3	0.13%
101-110 days	0	0	1	1	0.04%
111-120 days	0	0	1	1	0.04%
	1,059	561	614	2,234	100%



Discrepancy Log

According to Ms. Gray, the discrepancy log is an Excel spreadsheet she created and maintains to track requests for missing Edit Reports and Match Reports. An OIG analysis of the discrepancy log for November 14, 2017 through February 19, 2018 revealed 158 requests for missing Edit Reports or Match Reports⁴⁶ (76 requests for Edit Reports from the CMO and 82 requests for Match Reports from the Eckerd Placement Team).

Edit Report

The following is an example of an Edit Report, completed on March 20, 2018 by Ms. Hill.

CoBRIS Community Based Resource Information System

From: Hill, Latrice
To: Latrice Hill; Jai-Lin Gray; Carlie Ybarra; Laura Caniglia; LaToya Wingfield; Gary Dreslinski; Amanda Coquyt; Brian Ronayne; Alicia Kirkhom; Terenyia Little; Tasha Strachan; Maria Kalimopoulos; Adam McLaughlin; DeAndrea Thomas; Towanner Powell; Jesseka White; Tonya Bowles; Desiree Rodriguez-Vargas; Olga Rodriguez; John Epperson; Carolyn Fucillo; Tami Gonyea; Shannon Howard; Mary Roberts
Sent: Tuesday, Mar 20, 2018 09:17AM
Subject: CoBRIS Edit Request - 232960

Greetings,

Requesting User: latrice.hill
Requesting User Email:

Child: (10105898543)
Primary Unit: 232960
Case Name:
Current DOB:
Current SSN:

Placement Type: Parent
Placement Start Date: 3/16/2018
Provider Name:
Family Structure: Single Male
Provider Race: WHITE
Provider Ethnicity: OTHER
Provider Gender: Male
Relationship to Child: FATHER-BIRTH
Provider DOB:
Provider SSN:
Provider Address:
City, State, ZIP:
Phone:
Reason for Change: Reunification w/Parent(s) including Non-Custodial Parent
Child Placement Agreement needed: No

Thank you.

Match Report

The following is an example of a Match Report, completed on March 20, 2018 by Eckerd Placement Coordinator Holly Miller:



Match Report

Specialist: Holly Miller
Date: 03/20/2018
Time: 01:43:41
CMO Agency: YFA-West
Licensing Agency:

Child's Name:	
DOB:	SS#:
Race: Black/African American	Gender: Male
Original Removal Date:	Removed From:
Removal Reason:	
Previous Placement:	End Reason:
New Placement: Foster Home, Foster Home	Rate: \$458/Month
Home Type: Traditional Foster Home	
Provider Address:	
Placement Date: 03/16/2018	End Date:
Placement Planning: Long Term	Type Of Placement: Disrupted
Is An Initial Clothing Allowance Required: Yes	Will Funding Authorization Be Required: No
Is a Child Placement Agreement needed: No	
Additional Information:	
Meds No:	
Intake No:	
Movement reason: Foster mom wanted other kids	

⁴⁶ For all three CMOs combined. Though the discrepancy log identified the case managers, it did not identify the CMO.

Refusal Protocol

On July 31, 2017, Ms. Shirley initiated the Refusal Protocol for CMOs to follow when a child refuses placement. The Refusal Protocol is quoted as follows:

It is the expectation of Eckerd kids that no child will sleep in an office setting.

B. Process

Once a determination is made by the Case Management Organization that a child is refusing placement or for other reasons does not make it to their identified placement, the following protocol must be followed:

- 7. The CMO supervisor/designee must verbally notify their CMO Program Director.*
- 8. The CMO Program Director must verbally notify the ECA Director of Out of Home Care.*
- 9. The ECA Director of Out of Home Care must assess the situation and explore any and all options available statewide.*
- 10. The Program Director of the CMO must immediately verbally notify their Chief Operating Officer or Chief Executive Officer.*
- 11. The Chief Operating Officer or Chief Executive Officer must immediately verbally notify the ECA Executive Director to assess the situation and discuss next steps.*
- 12. Once it is determined that a child will be staying in an office setting, the CMO Program Director must complete a critical incident report.*

Eckerd E-mails

On April 4, 2018, Mr. Wright provided copies of Eckerd management e-mails in response to a request from the OIG Investigator. Of the 7,863 e-mails provided for the timeframe of November 14, 2017 through February 19, 2018, the following was deemed pertinent to this management review:

- On January 26, 2018, Ms. Gray sent an e-mail correspondence to the Data Management Team alerting them that “Placement Refusal - Child,” “Placement Refusal - Provider,” and “No Appropriate Placement Found” had been added to FSFN “under the ‘Other’ category.” She added, “When using these, please use Statewide Visitation as the provider and put the CMO agency as the address with a note that saying *[sic]* where the child stayed the night (i.e. *[sic]* Case Management Office).”
- On January 30, 2018, Mr. Bostick sent an e-mail correspondence to the management of the CMOs in Circuit 6,⁴⁷ in which he confirmed that “[c]hildren without permanent placements are to be supervised at all times to include the weekends” and “[i]f there are children not enrolled in school, [Eckerd needs] to be notified...” Mr. Luff responded on January 31, 2018 with a request for clarification regarding the use of critical thinking in situations regarding the use of a bus pass, to which Ms. Shirley responded (also on January 31, 2018) that she did not interpret Mr. Bostick’s e-mail to exclude all use of bus passes.⁴⁸

⁴⁷ Directions for Living, Lutheran Services Florida, and YFA.

⁴⁸ In follow-up to her verbal response, Ms. Shirley also provided a copy of this e-mail.

Eckerd Placement Services Guidelines

OHC-OG01 states that Eckerd Placement Services is the primary contact and coordinator for all placements of children in licensed out-of-home placements. They are available 24 hours a day and must publish their contact information to all CMO and investigating agencies.

FSFN Codes Developed by Eckerd

On March 22, 2018, Headquarters Data and Reporting Manager Keith Perlman provided an ad hoc FSFN report that included FSFN Service Codes and Service Text Values that were developed and used exclusively by Eckerd [4637 (Case Management Org), 4877 (Placement Refusal Child), 4878 (Placement Refusal Provider), and 4879 (No Appropriate Placement)]. An OIG analysis revealed that code 4637 (Case Management Org) was changed to 4877 (Placement Refusal Child) by the Data Management Team in the following three placements:

FSFN Case ID #	Child	Placement Begin Date	Date of Change
38953	Child 20	January 19, 2018	March 1, 2018
100122327	Child 7	December 7, 2017	January 24, 2018
2105822	Child 15	January 20, 2018	February 28, 2018

ADDITIONAL INFORMATION

STATEWIDE VISITATION PROVIDER

During the OIG review of FSFN placement information, it was discovered that the code "Statewide Visitation Provider" was being used to document a placement made in error in approximately six cases. The OIG Investigator discussed this use with Ms. Cowan, who suggested that the code was being used for reasons not intended and suggested contacting Ms. Leavine, who provided an explanation on the proper use of the code. After applying Ms. Leavine's definition to the use of the code, the OIG Investigator identified four YFA cases in which the code appeared to be misused, as follows:

FSFN Case ID #	Child	Date	Statewide Visitation Usage
38953	Child 20	January 19, 2018	Placement Refusal Child
100122327	Child 7	December 7, 2017	Placement Refusal Child
2105822	Child 15	January 20, 2018	Placement Refusal Child
100122327		December 22, 2017	Use of code over 30 days

On March 21, 2018, Ms. Leavine provided the following information via e-mail regarding the proper use of the Statewide Visitation Provider code:

The providers should only be used when the change in placement is typically more than 24 hours and less than 30 days.

...Temporary absences from placements within a Removal Episode include ... summer camp, respite, Baker Act confinement, DJJ detention, ...brief hospitalizations...visits with relatives and non-relatives...or visits with parents that are scheduled as a part of the reunification process. A temporary absence is, in short, a brief (typically more than 24 hours and less than 30 days) absence from the child's FSFN placement of record

with the understanding that the child is returning to the same placement once the temporary absence ends.

All temporary absences from a placement, regardless of the length of the absence, must be documented as a new placement event. This is a federal requirement...

A Chronological Note Type of "Note to File – General", describing the circumstances surrounding the temporary absence from placement must be documented in the child's FSFN record...

To document a temporary absence, the user ends the current placement for reason of "Placement Change Within Removal Episode."...The new (temporary) placement is documented either with a Person Provider or Organization Provider within the FSFN system or via the Statewide Visitation Provider.

SUMMARY

With regard to Issue 1 as to what was the process for reporting youth sleeping in locations other than approved placements in Circuit 13 and was the information accurately reported to the Department as required after November 14, 2017, this management review revealed the following:

- A June 22, 2016 Department memorandum clarified that the CBC Chief Executive Officer must immediately notify the Regional Managing Director if any child removed from his/her home is “allowed, directed, or otherwise put in a position to sleep or spend any significant, extended period of time in a...unapproved or unlicensed placement.”
- The Refusal Protocol, implemented by Eckerd on July 31, 2017, required that CMOs follow specified assessment and notification steps should a child refuse a placement, to include verbally notifying the Eckerd Executive Director and, should a child stay in an office setting, complete an Incident Report.
- On November 14, 2017, the Department re-initiated the process whereby Eckerd reported weekly, via a Placement Assignment Log (the Spreadsheet) sent by e-mail to SunCoast Regional Program Manager Kathleen Cowan, all problem placements for children in their care. The Spreadsheet is compiled by Eckerd Out-of-Home Care Director DeAndrea Thomas, who receives the information from her direct reports (the Eckerd Placement Team), who receive the information via e-mail, telephone, or text message from the case managers (CMs) when the CMs identify a problem placement. Effective the first week of February 2018, the Spreadsheet was submitted daily.
- Ms. Cowan testified that in addition to her weekly Spreadsheet review, she reviews IRAS reports daily and compares reports of inappropriate placements with FSFN to determine the accuracy of FSFN placement information, and contacts Eckerd Chief of Performance and Quality Lorita Shirley, Ms. Thomas, or Eckerd Director of Quality Control Kathy Bartlett to correct and clarify any discrepancies.

- Ms. Shirley testified that initially, the Spreadsheet had no written guidelines as to what it should contain and she instructed Ms. Thomas to modify it to include the name of every child with a placement issue.
- Ms. Shirley further testified that a child staying in an office or hotel is an inappropriate placement, classified as a critical incident, and reported to the Department; however, when a child refuses a placement and spends the night in a CM's vehicle, it is considered a refusal, classified as a non-critical incident, and not reported to the Department.
- Ms. Thomas testified that she is responsible for completing the Spreadsheet and e-mailing it to Ms. Cowan. She said that information regarding inappropriate placements or a child refusing a placement is provided by the assigned CM to Out-of-Home Care staff, who notify her. If a child is not in school or foster care, the child is the responsibility of the CM until a placement can be found.
- YFA Assistant Program Director Nyla Williams testified that when a child refuses a placement, the Refusal Protocol is initiated, and if the child spends the night somewhere other than the approved placement, the information is detailed in an Incident Report. If a foster home declines to accept a child into care, CMs do not include the information in the FSFN case notes or the FSFN placement tab, but it may be documented in a text message or telephone call to Eckerd Out-of-Home Care staff. She testified that if a child is not in the approved placement, FSFN placement information should be updated in order to track the child's placement.
- YFA Quality Control Coordinator Laurel Drew testified that Incident Reports of critical incidents (such as inappropriate placements) are sent to Eckerd, who submits the Incident Report to the Department. If the incident is downgraded (classified as "Other"), the Department is not notified.
- YFA CM Ilesha Rodriguez testified that the Refusal Protocol is initiated when a child refuses a placement, but there is no policy or procedure in place for documenting the refusal. There are no policies in place on how to document where to go or what to do while waiting with a child for a placement, and she does not document if she is at the office with a child.
- Eckerd Senior Placement Coordinator Alicia Kirkhom testified that if a foster parent agrees to take a child, even after a child refuses placement, that is the documented placement for the child unless a new placement is located timely. If the child refuses placement or a foster home cannot be timely located, the CM is supposed to take the child to their office (not the library, Wawa, or McDonalds); however, no specific written policy addressing this situation exists.
- Ms. Bartlett testified that an inappropriate placement is a critical incident, reported to the Department; however, a child refusing placement is not a critical incident and not reported to the Department. Ms. Bartlett further testified that she reviewed three incidents reported by YFA as inappropriate placements that were downgraded because the child refused placement. She said that YFA and Eckerd's definition of an inappropriate placement differ, in that Eckerd does not classify a child that refuses a placement as inappropriate, but YFA documents a refusal as an inappropriate placement on the Incident Report.
- Eckerd Quality Management Specialist Tanya Brown testified that if a child spent the night in an unapproved placement, it would be reported to Eckerd Quality

Management. She further testified that if an Incident Report is deemed not to be an inappropriate placement, it would be downgraded and not entered into IRAS.

- Regarding an Incident Report that had been downgraded because it was deemed not to be an overnight placement, in which a child had refused placement and stayed with the CM in a vehicle from 11:59 p.m. to 6:30 a.m., Ms. Brown stated, “Just because it is dark out does not mean that it is an overnight.” She clarified that she was not saying it was appropriate, but it was the beginning of a new calendar day so it was not deemed an inappropriate placement. She provided an example of an inappropriate placement as if a child did not have a place to sleep at 9:00 p.m., and at 3:00 a.m. had to stay in an office or somewhere else because a placement was not located prior to midnight.
- Ms. Shirley testified that YFA was required to document all children not in school in a weekly report to Eckerd, but not all children not attending school were reported. Child 1 told her that she (Child 1) and other children were left unsupervised during the day, and none of the children were documented in the weekly report.
- YFA Chief Operating Officer John Luff provided the OIG with a copy of a spreadsheet provided by YFA to Eckerd in August 2017, listing seven children not enrolled in school. Mr. Luff reported that the children in the spreadsheet were not listed in the weekly reports to Eckerd because Eckerd was already aware of them. The spreadsheet included the information, “[Child 1] is not currently in school. Part of her current VOP...is for refusing to attend school. She can attend a GED program upon return or the Catapult program for credit recovery but those are her only options.”
- An OIG review of Eckerd and YFA e-mails revealed that reporting from YFA to Eckerd took place as follows:
 - From August 18, 2017 through February 16, 2018, YFA Program Director Tami Gonyea sent weekly e-mails to YFA and Eckerd management regarding placement issues, reporting children in the YFA office overnight, not enrolled in or refusing to attend school, sick more than three days, or left without adult supervision. Child 1 was not in the weekly reports.
 - On November 16, 2017, YFA Program Director Marnie Keller sent an e-mail to Ms. Shirley reporting two children that refused placement and required overnight CM supervision throughout the night on six separate dates.
- **OIG Significant Findings:**
 - Eckerd and YFA differ in how they define inappropriate placements. This results in incidents of children sleeping in vehicles or other unapproved locations, submitted to Eckerd by YFA as critical, being coded by Eckerd as non-critical “Other” on Incident Reports. Therefore, these incidents were not reported to the Department via IRAS.
 - There is no evidence to suggest that YFA failed to report all children not in school to Eckerd; however, it appears as though YFA may not have continuously reported all children not in school.

With regard to Issue 2 as to whether Florida Safe Families Network (FSFN) placement information accurately represent placements of children under the supervision of Eckerd, this management review revealed the following:

- Ms. Shirley testified that the Data Management Team enters placement information into FSFN, and it is the responsibility of the CM to timely notify Eckerd when a child is no longer in foster care so the placement information can be updated. **If the placement information is not timely updated, the foster care facility will continue to receive payment for the child**, resulting in an overpayment. She said that Eckerd does not document child refusals of placements in FSFN.
- Ms. Shirley further testified that Eckerd created FSFN service codes to document when a child refused placement, a provider refused the placement, or there was no appropriate placement; however, the lack of documentation in FSFN regarding a child's refusal of a placement is a problem. She cited a lack of clearly defined guidelines regarding a placement, an inappropriate placement, and a temporary placement.
- Ms. Shirley testified that **if Eckerd identifies an appropriate placement and a child refuses it, Eckerd is not required to search for another.** She expressed frustration at the lack of authority to handle children who repeatedly refuse placements.
- Eckerd Data Management Supervisor Jai-Lin Gray testified that the Data Management Team enters the placement data into FSFN upon receipt of the information from the CM. She testified that the CM has 48 hours (two business days) to complete the Edit Report, then the Data Management Team has an additional 48 hours to enter the placement information into FSFN, so the placement information technically does not have to be entered until 96 hours (four business days) after the placement occurs. Ms. Gray further testified that if the Eckerd Placement Team or CMO does not complete the Match Report or Edit Report, the Data Management Team cannot update FSFN with the current placement information. She stated the Data Management Team maintains a discrepancy log to track requests for missing Match Reports and Edit Reports requested from the Eckerd Placement Team or CMOs.
- Ms. Thomas testified that any licensed foster care placement is reported to the Eckerd Placement Team, which is responsible for completing a Match Report to submit the information to the Data Management Team. She said there may be a delay in entry of placement information. For example, if a foster care placement occurs on a Friday, the earliest the placement information would be documented in FSFN would be the following Monday or Tuesday, because the Data Management Team has 48 hours to enter the information and does not work on weekends.
- Eckerd Senior Placement Supervisor Alicia Kirkhom testified that placement coordinators document placement changes by submitting a Match Report to the Data Management Team and added that FSFN will not allow a placement entry to be made unless there is a "removed from" entry and the "removed from" address must match the previous placement address.
- Eckerd Placement Coordinator Terenycia Little testified that Match Reports are expected to be submitted by 12:00 p.m. the day following the placement, after verification of the placement by the placement coordinator, and are not

completed when the placement is initially found. She added that if the child did not stay at the placement, the placement should not be listed in FSFN, and if the child refused placement, it is the CM's responsibility to complete an Edit Report to notify the Data Management Team where the child spent the night. She confirmed there is no documentation for attempted placements.

- YFA Case Manager Supervisor (CMS) Juana Corrada testified that any time a child refuses a placement, the CM must notify the Eckerd Placement Team so another placement can be located and the CM must maintain supervision of the child until another placement is secured. In some instances, if a placement is not found, the child stays in the vehicle with the CM overnight. She added that she never documented a child refusing a placement on the Incident Report, but if a placement occurs during the night, the on-call supervisor is notified, and that supervisor notifies YFA management and sends an e-mail to Eckerd management regarding the placement issue.
- YFA CMS Joshua Stamp testified that once a child is placed, the CM enters an Edit Report within 48 hours to update Eckerd of the placement information. He believed that if the placement was not entered within 48 hours, the Eckerd Placement Team sent an e-mail to the CM and CMS. If a foster parent refuses to take in a child, the CM and the child typically return to the office and wait for Eckerd to find another placement, which he documents as a note to file in FSFN; however, he does not document that the CM waited with the child at the office. He said that if there is an incident specifically related to placement, he will report the incident either by telephone or e-mail to both his assistant program director and the Eckerd Placement Team prior to submitting the written Incident Report.
- Ms. Rodriguez testified that a child moving between long-term placements is documented by the CM completing an Edit Report; however, for night-to-night placements, Eckerd completes the Edit Report. She said that CoBRIS is only updated with the final drop-off location of the child and attempts to place the child are not documented in FSFN.
- YFA CM Taja Pryor testified that when a child refuses placement, she notifies her supervisor, who in turn notifies the program director, and the notification continues up the chain of command to the Department. She does not document the child's refusal in FSFN case notes when she is on call because the child is not on her caseload, but the child's refusal is documented on an Incident Report, which is submitted electronically to Eckerd.
- YFA CM Nicole "Nick" Kosobud testified that once a child is placed, he will edit the placement information in CoBRIS. When a child refuses placement, Eckerd will begin looking for a new placement, during which time he is responsible for the child. The attempted placements are not documented in FSFN. To the best of his knowledge, the refusals are only documented via e-mail between Eckerd and YFA as a method of notification. If he must keep a child in his car at Wawa because a placement has not been identified, he notifies his supervisor by text message or e-mail. It is not YFA policy to document in CoBRIS that they parked at a Wawa overnight with a child.
- YFA Lead Family Services Worker (FSW) Adam Childs testified that he only documents the placement of a child, but not what occurs between placement attempts. He notifies the CM and CMS if there is a problem placement, but does

not enter any placement data into FSFN or CoBRIS. The FSWs are not authorized to enter data into FSFN.

- YFA FSWs Cydmarie Santiago, Anthony Mills, and Tameka Carswell each testified that they document in the TYSF comment section if a child is injured under their supervision, a foster parent refuses a child, or a child refuses the placement. They deliver the completed TYSFs to Ms. Bradshaw, who files the form in the case file. They do not document if they bring a child to the YFA office if there is a gap in time between when they pick up the child and drop the child off at a placement.
- Eckerd Data Management Specialist (DMS) Jesseka White testified that the Eckerd Placement Team completes a Match Report for licensed providers and the CMO creates an Edit Report for non-licensed providers. She said if there is a time lapse between placement and the entry of the placement information into FSFN, it is due to a delay in the Data Management Team receiving the information from the Eckerd Placement Team and/or CMO.
- Eckerd DMS Gary Dreslinski testified that there were occasions in which the Eckerd Placement Team submitted placement information later than the 48-hour requirement and sometimes he cannot enter a placement change because the prior placement was not entered into FSFN. When that occurs, he requests the missing information from the Eckerd Placement Team and documents the discrepancy in the discrepancy log. He further testified that YFA is not submitting placement information within the 48-hour period, and it is the CM's responsibility to complete an Edit Report when a missing child is located.
- Eckerd DMSs Laura Caniglia, Lotonya Wingfield, and Carlie Ybarra testified that the placement information entry lags in the four examples discussed were due to the adoption process or reclassification of the provider for reimbursement.
- During the course of this management review, the OIG reviewed FSFN placement information and case notes, placement information reported to Eckerd and the Department via Incident Reports, Match Reports, Edit Reports, and the Spreadsheet, and e-mails from both Eckerd and YFA. From this data, the OIG determined the following:
 - Of the 35 placements identified by Ms. Cowan as reported on the Spreadsheet, five were determined by the OIG to have inaccurate FSFN data.
 - Of the 2,234 placement entries made for children under the care of Eckerd CMOs with new or change of placement from November 14, 2017 through February 26, 2018, 12 were identified with incorrect or missing placement information; six had case notes that did not match the placement data; and one was identified as incorrect due to a failure to update the placement data with the child's refusal, resulting in an overpayment to the provider.
 - During the review period (November 14, 2017 through February 19, 2018), there were approximately 158 missing Edit Reports or Match Reports for all three CMOs. Without these reports, the Data Management Team cannot update FSFN with the child's current placement location.

- A review of all FSFN placements in Circuit 13 from November 14, 2017 through February 26, 2018 reflect that placement information was not always entered timely. Only 563 out of 2,234 (25.2%) placements were entered within 48 hours, with 18 entered more than 60 days after the placement occurred.
 - During the review of FSFN placement data for November 14, 2017 through February 26, 2018, 1,671 (74.8%) placements were identified in which the placement information was not added to FSFN within 48 hours.
- **OIG Significant Findings:**
- Currently, the capability does not exist for real-time placement information updates in FSFN.
 - There is no standardized method in the FSFN placement tab to document placement refusals or children sleeping in unapproved locations.
 - FSFN placement data is not reliable or up-to-date in all cases.

RECOMMENDATIONS AND ACTIONS

The OIG recommends that the SunCoast Regional Managing Director:

- Review this report, provide a copy to the management of Eckerd Connects (Eckerd) and Youth and Family Alternatives, Inc. (YFA) and take any corrective action deemed appropriate.
- Based on witness testimony indicating that witnesses understood each entity to have two working days to submit or enter information into FSFN (for a total of up to four working days), combined with an OIG review of FSFN records revealing that almost 75% of placement entries were made outside of two days, remind Eckerd to ensure that FSFN is updated within two working days for standard case work of any changes known to Eckerd or its CMOs.
- Based on witness testimony that there is no option in FSFN to document placement refusals, consider adding drop-down options to clearly document child or provider refusals in the FSFN placement tab, as well as a placement narrative to capture any unusual placement circumstances.
- Consider having Eckerd allocate Data Management Team staff for weekend coverage to ensure the FSFN placement data is updated within the 48-hour guidelines as required by contract.
- It was determined that Eckerd and YFA each define “Placement” differently in that YFA documents a placement refusal as an inappropriate placement on the Incident Report; however, Eckerd does not classify a child refusing placement as inappropriate, and Eckerd and YFA each use their subjective discretion to determine what constitutes an extended or significant amount of time sleeping or spent in an unapproved or unlicensed placement. Based on that determination, the OIG recommends that a guideline or policy pertaining to the term “Placement,” to include time parameters and clear reporting requirements, be established.

- Based on witness testimony, case managers do not have the ability to enter placement information in the FSFN placement screen; however, they do report discrepant information to Eckerd, who has codes for other situations not considered a placement (spending the night in an office, vehicle, or any other public place). Consider implementing a process to allow case managers to document the situation in FSFN under the narrative screen, thereby ensuring that the location of all children is known at all times.
- Consider conducting periodic audits of FSFN data, including timeliness of entries, billing information, and any other documentation to ensure validity and accuracy of placement information.
- If the premise is to have “real time” placement information for children in care, then consider a program that will allow CoBRIS to be compatible with FSFN to allow real time placement entries into FSFN by CMOs.
- Based on the current practice of CBCs generating their own placement codes, which creates inconsistencies statewide, consider removing permissions from FSFN that allow CBCs the ability to establish their own placement codes.

POST-INVESTIGATIVE ACTIVITIES

In compliance with § 20.055(7)(e), Florida Statutes (F.S.), copies of this report were provided to the management of Eckerd Connects-Hillsborough (Eckerd) and Youth and Family Alternatives, Inc. (YFA) on May 9, 2018.

On May 16, 2018, the OIG received a verbal telephonic response from Eckerd Chief of Performance and Quality Lorita Shirley. As a result of Ms. Shirley’s verbal response, the OIG revised this management review as noted within the report.

On June 5, 2018, the OIG received a written response via e-mail from Eckerd Chief of Community Based Care Chris Card. After review of the written response, the OIG further revised this management review as noted within the report.

On June 7, 2018, the OIG received a written response from YFA President and CEO Mark Wickham via e-mail from YFA Chief Operating Officer John Luff. After review of the written response, the OIG further revised this management review as noted within the report.

The written responses from Eckerd and YFA are attached to this management review.

This management review has been conducted in accordance with the ASSOCIATION OF INSPECTORS GENERAL Principles & Quality Standards for Investigations.

REFERENCES

CONTRACT INFORMATION

Through Contract #QJ3E0 (effective July 1, 2012 through June 30, 2020), the Department contracts with Eckerd Connects-Hillsborough (Eckerd), to serve as the lead agency in Circuit 13.

Eckerd subcontracts with Youth and Family Alternatives, Inc. (YFA) through Contract #ECA-C13-CMO-YFA-FY20 (effective July 1, 2017 through June 30, 2020), to provide foster care and related services in Circuit 13. On February 6, 2018, Eckerd Chief Financial Officer (CFO) Randall Luecke sent a termination notice via certified mail to YFA Chief Executive Officer (CEO) Mark Wickham stating that the contract will be terminated effective May 8, 2018.

EXPLANATION OF TERMS

Baker Act	The Florida Mental Health Act, commonly known as the Baker Act, authorizes the Department to evaluate, research, plan, and recommend programs designed to reduce the occurrence, severity, duration, and disabling aspects of mental, emotional, and behavioral disorders.
Circuit 6	Circuit 6 consists of Pasco and Pinellas Counties.
Circuit 13	Circuit 13 consists of Hillsborough County.
CoBRIS	Community Based Resource Information System (CoBRIS) is an internet based software application developed to assist human service agencies in daily management, operations, and reporting. Through an extract of data from FSFN, combined with local, agency-specific data, CoBRIS allows managers to monitor staff performance, access reports, monitor utilization, and track children in care.
Discrepancy Log	The discrepancy log is an Excel spreadsheet utilized by the Eckerd Data Management Team to track requests for and receipt of missing Edit Reports and Match Reports.
Edit Report	The Edit Report is completed by the Case Management Organizations upon a change in placement involving non-licensed providers. The completion of the Edit Report in CoBRIS generates an e-mail notification of the change to the Data Management Team.
FSFN	The Florida Safe Families Network (FSFN) is the legal electronic system of record used by the Department to track child and adult intake/reports and investigations and case management for children.
Incident Report	The Incident Report is a form utilized by Eckerd and its subcontracted providers to document immediate incidents (Client death, child-on-child sexual abuse, sexual battery, and media

	coverage), critical incidents which include inappropriate placement, and non-critical incidents which include “Other” incidents. Immediate and critical incidents are entered in the Department Web Portal.
IRAS	The Incident Reporting and Analysis System (IRAS) is an online incident reporting tool used by the Department that allows for the timely notification of critical incidents, provision of details of the incident and immediate actions taken, and the ability to track and analyze incident-related data.
Match Report	The Match Report is a document completed by the Eckerd Placement Team upon a change in placement involving licensed providers. The completion of a Match Report in CoBRIS generates an e-mail notification of the change to the Data Management Team.
Other	An incident marked as “Other” on an Incident Report is classified as a non-critical incident. It is included in IRAS with incidents such as altercation, medical error, theft, vandalism, or destruction of property. None of these incidents are reported to the Department, but all have IRAS numbers.
Placement	Per Rule 65C-30.001, F.A.C., “Placement” is defined as the supervised placement of a child in a setting outside the child’s own home.
SunCoast Region	The SunCoast Region consists of Circuit 6; Circuit 12 (DeSoto, Manatee, and Sarasota Counties); Circuit 13; and Circuit 20 (Charlotte, Collier, Glades, Hendry, and Lee Counties).
Supervision	Per Rule 65C-30.001., F.A.C., “Supervision” is defined as responsibility for managing a safety plan to ensure enhancement of diminished protective capacities and/or permanency for unsafe children.
TYSF	A Transfer of Youth Supervision Form (TYSF) is utilized by YFA to document when a child is transferred from one caregiver to another, such as a foster home, school, etc.
Transporter	A transporter is a family support worker that assists case managers in providing case management services such as transporting child to and from appointments, supervised visits, school, and placements. Transporters do not document or update information in FSFN.
Web Portal	A web portal is a specifically designed website that brings information from diverse sources of electronic communication together in a uniform way.